

# **EXHIBIT A**

CACE-23-019056

IN THE CIRCUIT COURT OF THE 17TH  
JUDICIAL CIRCUIT IN AND FOR  
BROWARD COUNTY, FLORIDA

CASE NO. CACE-23-019056

LITIGATION LAWYERS, PROFESSIONAL  
ASSOCIATION, a Florida professional  
corporation,

Plaintiff,

vs.

CHRISTERPHOR HARBISON, individually,  
and REGINA HARBISON, individually,

Defendants.

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**SUMMONS**

THE STATE OF FLORIDA:  
To Each Sheriff of the State:

YOU ARE COMMANDED to serve this Summons, a copy of the Complaint, and the First  
Request for Production of Documents to REGINA HARBISON, in this action on:

REGINA HARBISON  
Primary Residence  
10576 Harbison Trails a/k/a Honeysuckle Trails  
Mineral Point, MO 63660

Alternate Residence  
395 Stonebridge Lane  
Sunrise Beach MO 60579

Each Defendant is required to serve written defenses to the Complaint on OFER M. AMIR, ESQ., the Plaintiff's attorney, whose address is LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION, 2881 East Oakland Park Blvd., Ste. 434 Fort Lauderdale, FL 33306; Telephone: (954) 673-5444 – (954) 356-0496; (E-Mail: [omamir@omamir.com](mailto:omamir@omamir.com); [omamir503@gmail.com](mailto:omamir503@gmail.com), [courtfilings@litlawyers.com](mailto:courtfilings@litlawyers.com), within 20 days after service of this Summons on that Defendant, exclusive of the day of service, and to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint.

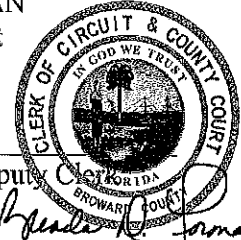
**EXHIBIT A**

DATED on      OCT 04 2023     

BRENDA D. FORMAN  
As Clerk of said Court

By:                     

As Deputy Clerk



*Brenda D. Forman*  
BRENDA D. FORMAN

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached Complaint with the clerk of this court located at the Broward County Courthouse, 201 SE 6th Street, Ft. Lauderdale, FL 33301. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff's Attorney" named below.

Plaintiff's Attorney:  
OFER M. AMIR, ESQ.  
LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION  
2881 East Oakland Park Blvd., Ste. 434  
Fort Lauderdale, FL 33306  
Telephone: (954) 673-5444; (954) 356-0496  
(E-Mail: [omamir@omamir.com](mailto:omamir@omamir.com);  
[omamir503@gmail.com](mailto:omamir503@gmail.com),  
[courtfilings@litlawyers.com](mailto:courtfilings@litlawyers.com))  
(Florida Bar No.: 929530)

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal, Main Courthouse, Broward County Courthouse, 201 SE 6th Street, Ft. Lauderdale, FL 33301. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojada de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Plaintiff's Attorney:  
OFER M. AMIR, ESQ.  
LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION  
2881 East Oakland Park Blvd., Ste. 434  
Fort Lauderdale, FL 33306  
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[courtfilings@litlawyers.com](mailto:courtfilings@litlawyers.com))  
(Florida Bar No.: 929530)

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal Broward County Courthouse, 201 SE 6th Street, Ft. Lauderdale, FL 33301. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées, ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones).

Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie de votre réponse écrite au Plaintiff's attorney" nommé ci-dessous.

Plaintiff's Attorney:  
OFER M. AMIR, ESQ.  
LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION  
2881 East Oakland Park Blvd., Ste. 434  
Fort Lauderdale, FL 33306  
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Defendants.

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To Each Sheriff of the State:

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CHRISTERPHOR HARBISON

Primary Residence

10576 Harbison Trails a/k/a Honeysuckle Trails  
Mineral Point, MO 63660

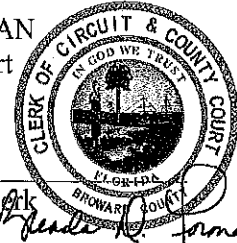
Alternate Residence

395 Stonebridge Lane  
Sunrise Beach MO 60579

Each Defendant is required to serve written defenses to the Complaint on OFER M. AMIR, ESQ., the Plaintiff's attorney, whose address is LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION, 2881 East Oakland Park Blvd., Ste. 434, Fort Lauderdale, FL 33306; Telephone: (954) 673-5444 – (954) 356-0496; (E-Mail: [omamir@omamir.com](mailto:omamir@omamir.com); [omamir503@gmail.com](mailto:omamir503@gmail.com), [courtfilings@litlawyers.com](mailto:courtfilings@litlawyers.com), within 20 days after service of this Summons on that Defendant, exclusive of the day of service, and to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint.

DATED on OCT 04 2023

BRENDA D. FORMAN  
As Clerk of said Court



By: \_\_\_\_\_  
As Deputy Clerk  
*Brenda D. Forman*  
BRENDA D. FORMAN

**IMPORTANT**

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If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff's Attorney" named below.

Plaintiff's Attorney:  
OFER M. AMIR, ESQ.  
LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION  
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Fort Lauderdale, FL 33306  
Telephone: (954) 673-5444; (954) 356-0496  
(E-Mail: [omamir@omamir.com](mailto:omamir@omamir.com);  
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IMPORTANTE

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Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, debera usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

Plaintiff's Attorney:  
OFER M. AMIR, ESQ.  
LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION  
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[omamir503@gmail.com](mailto:omamir503@gmail.com),  
[courtfilings@litlawyers.com](mailto:courtfilings@litlawyers.com))  
(Florida Bar No.: 929530)



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Si vous choisissez de depoter vous-meme une reponse ecrite, il vous faudra egalement, en meme temps que cette formalite, faire parvenir ou expedier une copie de votre reponse ecrite au Plaintiff's attorney" nomme ci-dessous.

Plaintiff's Attorney:  
OFER M. AMIR, ESQ.  
LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION  
2881 East Oakland Park Blvd., Ste. 434  
Fort Lauderdale, FL 33306  
Telephone: (954) 673-5444; (954) 356-0496  
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[omamir503@gmail.com](mailto:omamir503@gmail.com),  
[courtfilings@litlawyers.com](mailto:courtfilings@litlawyers.com))  
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corporation,

Plaintiff,

vs.

CHRISTERPHOR HARBISON, individually,  
and REGINA HARBISON, individually,

Defendants.

---

**PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS  
AND THINGS TO DEFENDANT, CHRISTERPHOR HARBISON**

COMES NOW the Plaintiff, LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION, and hereby serves its First Request for Production upon the Defendant, CHRISTERPHOR HARBISON, an individual, and requests that you produce and make available for inspection or duplication at Litigation Lawyers Professional Association, 2881 E. Oakland Park Boulevard, Suite 434, Fort Lauderdale, Florida 33306, the documents, specified herein, which are in your possession, custody, or control or in the possession, custody or control of your agent(s), employee(s), or attorney(s). You are requested to make such production in accordance with the Fla. R. Civ. P. 1.350, within 45 days of service of this request, to the undersigned counsel.

DATED on this 29<sup>th</sup> day of September, 2023.

LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION  
2881 E. Oakland Park Boulevard, Suite 434  
Fort Lauderdale, Florida 33306  
Tel: (954) 356-0496  
Tel: (954) 673-5444  
Email: [omamir@omamir.com](mailto:omamir@omamir.com)  
Email: [omamir503@gmail.com](mailto:omamir503@gmail.com)  
Email: [courtfilings@litlawyers.com](mailto:courtfilings@litlawyers.com)

By: Ofer M. Amir, Esq.  
Ofer M. Amir, Esq.  
Florida Bar No. 929530

**SCHEDULE "A"**  
**DEFINITIONS AND INSTRUCTIONS**

As used herein:

- A. The term "person" means any natural person or any entity, including, without limitation, any individual, firm, corporation, company, association, partnership, business, public agency, department, bureau, board, commission or any other form of public, private or legal entity. Any reference herein, whether specific or within the term "person", to any public or private company, partnership, association or other entity includes such entities subsidiaries and affiliates and the entity's and it's subsidiaries' and affiliates' present and former directors, officers, employees, attorneys, agents or anyone acting for any of them at their direction, or under their control.
- B. The term "writing" includes, but is not limited to, books, records, letters, telegrams, notes, memoranda, diaries, worksheets, computations, tabulations, financial statements and drafts of any of the foregoing, whether originals or copies and in whatever language, and all other tangible things on which words, figures, notations or sounds are recorded in writing or by any other means, and any such material underlying, supporting or used in the preparation thereof.
1. The term "identify" or "state".
- (1) when used with reference to an individual person, means to state his full name, his position and business affiliation at that time referred to, his last known position and business affiliation, his last known residence and business addresses and his last known residence and business telephone numbers;
- (2) when used with reference to a firm, partnership, corporation, association or other business enterprise, means to state its full name, address and telephone number; and,
- (3) when used with reference to a writing, means
- (a) to state its date, author, addressee, recipient and type (e.g., book, record, letter, memorandum, etc., or some other means of identifying it);
- (b) to state its present location and custodian; and,
- (c) either to state the substance thereof or to annex to and incorporate in the answer to these Interrogatories a true and correct copy thereof.
- D. The term "documents" or "correspondence" as used herein, means and includes originals (or copies if originals are unavailable) of all writings, records, all written, printed, typed or graphic matter and all tangible things of every type, kind and descriptions, however produced, copied or reproduced, whether draft or final, redrafted, executed, erased or otherwise defaced or mutilated, from whomever and

wherever obtained, including without limitation, any and all of the following: abstracts, accruals, acknowledgments, adding machine tapes, advertisements in any newspapers, magazines for trade journals, affidavits, agent of record letters, agreements, analyses, annual reports, applications, appointment books, appointment records, appraisals, articles, articles of incorporation and amendments thereto, audio recordings whether or not transcribed, audit programs, audit instructions and other audit materials, audit reports, balance sheets, bids, filing sheets, filing summaries, billings, bills, bills of lading, binders, blanks, books, books of account, brochures, budgets, by-laws and amendments thereto, cablegrams, calendars, cash flow projections, certificates, certificates of deposit, change orders, charters, charts, checks, checking account records, circulars, commitment letters, communications, compilations, computer cards, computer cassettes, computer disks, computer printouts, computer programs, computer readouts, computer tapes, confessions, confirmations and responses to confirmations, contracts, corporate documents, correspondence, court pleadings, covenants, credit analyses and reports, data compilations from which information can be obtained or translated through detection devices, data processing cards, disks and tapes or computer-generated printouts, output or other interpretations thereof, date records, delivery records, desk calendars, diaries, drafts, draw or funding requests, drawings, electronic mail, entries, estimates, expense records of reports, field notes, files, filings or records, films, financial analyses, financial statements, forms and form documents, graphs, handbooks, handwritten notes or transcripts of such notes, income statements, indices, instruments, inter-office communications, inventory tags and records, invoices, itemizations, joint venture agreements, journals, leases, ledgers, letters, licenses, liens, logs, mail receipts (registered or certified), management reports, manuals, maps, market studies, meeting reports, memoranda, memoranda of all conversations of any kind and by any means (including telephone), mortgages, minutes, newspapers, magazines or trade journals, articles or advertisements, notations, notebooks, notes, offers, operating statements, opinions, order forms, orders, pamphlets, payroll records, permits, personal statements or interviews or summaries thereof, personnel files, photocopies, photographs, pictures, plans, plats, pocket calendars and diaries, press releases, pro formas, projections, proposals, prospectuses, publications, purchase orders, releases, receipts, recordings, records, records of account, regulations, rent rolls, reports, requests, requisitions, research, resolutions, reversals, scraps of paper, security instruments, sketches, specifications, stock certificates or records, studies, submissions, summaries, tapes or tape recordings or transcripts thereof, tax returns and records, telecopies, telecopy coversheets, telegrams, telephone bills, records or invoices, telexes, texts, time records, time slips, title reports, policies and commitments, training manuals, transcripts, travel records, receipts and vouchers, treasury bills, valuations, video recordings, warehouse receipts, wire records or transfers, writings or work papers, as well as any other matter or media similar to any of the foregoing, however denominated, along with all non-identical (or, by reason of subsequent annotation, no longer identical) copies, drafts or versions thereof and all copies thereof containing any commentary, notations or markings whatsoever.

- E. The term "all documents" means every document or group of documents or communications, as defined, known to you, and every such document or

communication which can be located or discovered by diligent efforts. It excludes documents which were previously produced in the course of discovery in this action.

- F. The term “address” means the last known home and business address of a person or other entity.
- G. The term “Plaintiff” as used herein, refers to LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION, a Florida Corporation, or where applicable, its parent, subsidiary or other related or affiliated organizations, and its officers, directors, employees, consultants, representatives, attorneys, accountants and agents, and all other persons acting or purporting to act on its behalf.
- H. The term “Defendant” as used herein, refers to CHRISTERPHOR HARBISON, or where applicable, his employees, consultants, representatives and agents, and all other persons acting or purporting to act on his behalf.
- I. The term “actions” or “lawsuits” means the numerous lawsuits filed between Patriots Bank and its Court Appointed Receiver and either Regina Harbison, Christerphor Harbison or any of their affiliated or related business entities.
- J. The term “relating to” means containing, constituting, showing, mentioning, reflecting or pertaining or referring in any way, directly or indirectly to, and is meant to include, among other documents, documents underlying, supporting, now or previously attached or appended to or used in preparation of any document called for by each request.
- K. The conjunctions “and” and “or” shall each be individually interpreted in every instance to mean “and/or” and shall not be interpreted disjunctively to exclude any information otherwise within the scope of any request.
- L. Each numbered request is to be responded to separately and as thoroughly as possible. The fact that investigation is continuing or that discovery is not complete shall not be used as an excuse for failure to respond to each request as fully as possible. The omission of any document, thing or item of information shall be deemed a representation that such document is not known to Defendant(s), their counsel or other representatives at the time of the service of the response.

#### **TIME LIMITATION**

Unless otherwise specifically indicated in any individual request for production, the time period to which these requests relate is the period beginning from July 1, 2021 to the date of your production in response to this request.

### INSTRUCTIONS

1. The documents or categories of documents which you contend are responsive to each separate request and their location should be set forth in your written request pursuant to the Florida Rules of Civil Procedure. Documents responsive to each request should be produced in the order in which they are kept in the ordinary course of your business activities.

2. If you object in part to any request for production, please produce the portion of the documents requested to which you do not object and state your objection to the remainder.

3. When producing any documents not legible to the unaided human eye, also produce the means for translating it to a form legible to the human eye and instructions for translation.

4. If the attorney/client privilege or the work product privilege is asserted in response to any production request, then identify the document by its:

- a. date;
- b. general nature, e.g., letter, memorandum, photograph, computer printout, etc.;
- c. subject matter;
- d. author or originator;
- e. each person indicated as an addressee or copy recipient, or known or believed by Defendant(s) to have received a copy of the document;
- f. present custodian of each copy of the document;
- g. alleged ground or grounds for withholding production; and,
- h. sufficient particulars to allow Plaintiff to evaluate the claim of privilege or immunity asserted.

5. Produce the original and each copy in your possession, custody or control of the documents and categories of documents designated.

6. With respect to each document requested herein which has been lost, destroyed or otherwise disposed of since its preparation or receipt, provide the following information separately as to each document:

- (a) general description of the subject matter;
- (b) author;
- (c) recipient(s);
- (d) date;
- (e) last custodian of the document; and,
- (f) the circumstances under which the document was lost, destroyed or otherwise disposed of;

**SPECIAL INSTRUCTIONS FOR DATA STORED OR MAINTAINED IN  
ELECTRONIC, ELECTROMAGNETIC, PHOTOGRAPHIC, DIGITAL, OR  
MECHANICAL FORM**

These requests cover all documents, including electronically-stored information (ESI), in, or subject to, your possession, custody, or control, including, but not limited to, all documents (including ESI) that you have the ability to obtain, that are responsive, in whole or in part, to these requests. Our client is prepared to discuss the terms of production of ESI. In the absence of an agreement, ESI should be produced in the following form: (1) all documents should be produced as Type IV single page tiff files and name each tiff file with the Bates number labeled on the corresponding page; (2) documents should not be divided across folder directories and an image load file (e.g., .LFP file) that defines all document page breaks should be provided; (3) the extracted full text from the body of each document should be produced as a .txt file, and for each document scanned from hardcopy or containing redactions, the OCR should also be produced as a .txt file. Our client specifically requests that you produce a separate .txt file for each electronic or scanned document and that you name each .txt file with the Bates number labeled on the first page of each corresponding document (e.g., BATES0000001.txt). Our client further requests that you produce in the form of a .dat file extracted metadata for each of the following metadata fields for each electronic document:

1. DOCID	Image bates number
2. MSGID	Message ID 6
3. TO	To
4. FROM	From
5. CC	CC
6. BCC	BCC
7. SUBJECT	Subject
8. EMAIL-BODY	Email Body
9. FOLDERNAME	Folder Name
10. DATECREATED	Date Created
11. DATESAVED	Date Saved
12. DATERCVD	Date Received
13. TIMERCVD	Time Received
14. DATESENT	Date Sent
15. TIMESENT	Time Sent
16. INTMSGID	Internet Message ID
17. APPLICATION	Application
18. ATTACHRANGE	Attachment range
19. ATTACHTITLE	Attachment Title
20. ATTACHCOUNT	Attachment Count
21. CONVTHREAD	Conversation Thread
22. CUSTODIAN	Custodian of collection
23. MEDIA Edoc,	Email, Attachment
24. DOCLINK	Link to native file
25. ATTACHID	Attachment bates id



26. PARENTID	Parent bates id
27. FOLDER	Folder path
28. FILENAME	File Name
29. AUTHOR	File Author
30. FILEEXT	File Extension
31. HASHCODE	MD5 Hash
32. CUSTODIAN	Source or custodial information

Our client specifically reserves the right to request the production of additional metadata fields and/or to request the production of ESI in native format if the imaged form does not provide adequate detail or could be better understood in native electronic form. To the extent that any documents are produced in native electronic form, you should name each native file with the Bates number labeled on the first page of the native file's corresponding imaged file and the appropriate file extension (e.g., BATES00000001.xls).

With respect to electronic mail, when producing responsive electronic mail, the electronic mail should be produced in a format that includes the originating address, all copies and blind copies, the date and time of transmission, each attachment, the mailbox or other post office storage location of every copy, and all replies and/or forwards of the electronic mail.

#### **SPECIAL INSTRUCTIONS AGAINST SPOILIATION OF EVIDENCE**

Accordingly, our client demands that you continue to take all steps necessary to preserve all documents, records, data and files that may be relevant to this dispute including, without limitation, documents, records, data and files kept by electronic, electromagnetic, photographic, digital or mechanical means, whether or not contained in current, backup or archival files of personal computers and networks or on hard drives, diskettes, CD-ROM disks, magnetic tapes, back-up tapes, or Zip and Jazz cartridges.

You must cease and desist from overwriting existing data, or running data compression or defragmentation routines or "shredder programs" on any such documents, records, data or files before full compliance with the discovery requests made herein is determined so as to prevent the inadvertent alteration or deletion of such documents, records, data and files. All metadata should be preserved.

**SCHEDULE "A"**

**DOCUMENTS AND THINGS TO BE PRODUCED**

**I. CONTRACTS AND AGREEMENTS**

1.1 All contracts, engagement letters and agreements between CHRISTERPHOR HARBISON and LITIGATION LAWYERS, together with any modifications thereof.

**II. BILLINGS AND PAYMENT RECORDS**

2.1 All invoices, bills, correspondence, itemized billing statements, billing cover letters and other records, pertaining to work done by LITIGATION LAWYERS, which were received by CHRISTERPHOR HARBISON.

2.2 All records and documents reflecting any retainer or payments made, for legal services rendered by LITIGATION LAWYERS, including without limitation, copies of all checks (fronts and backs), and a copy of all receipts for the payment of attorneys' fees and costs, to, or from, LITIGATION LAWYERS.

2.3 All markups or notes made by CHRISTERPHOR HARBISON, on or concerning any invoices, itemized billing statements and billing cover letters of LITIGATION LAWYERS.

**III. NOTES AND MEMORANDUMS OF MEETINGS; PHONE CALLS**

3.1 All notes or memorandum created by CHRISTERPHOR HARBISON, including hand-written, typed or computerized notes and records, concerning any meeting, conferences, or phone conversations, at any time from July 1, 2021, with any personnel of the LITIGATION LAWYERS.

3.2 All notes (handwritten or electronic) made by CHRISTERPHOR HARBISON, in regard to any meeting or phone conversation with LITIGATION LAWYERS.

3.3 All notes (handwritten or electronic) made by CHRISTERPHOR HARBISON, in regard to any meeting or phone conversation or e-mail communication with any person, concerning LITIGATION LAWYERS.

3.4 All text or records of phone message(s) made by you pertaining to or concerning LITIGATION LAWYERS' representation of CHRISTERPHOR HARBISON.

#### **IV. COURT FILINGS AND COMMUNICATIONS**

4.1 All documents filed with the Court in the actions and lawsuits, involving Patriots Bank, and its Court Appointed Receiver, by LITIGATION LAWYERS or by other counsel for CHRISTERPHOR HARBISON.

4.2 Copies of all court filings, together with Defendant correspondence, emails or other papers, relating to the actions and lawsuits, with Patriots Bank, and its Court Appointed Receiver, which were sent by Christerphor Harbison or received from LITIGATION LAWYERS.

#### **V. CORRESPONDENCE**

5.1 All correspondence, letters, facsimiles, memoranda, text messages, or emails (including all attachments and enclosures) between CHRISTERPHOR HARBISON, and LITIGATION LAWYERS from July 1, 2021, through the present.

5.2 All correspondence, e-mails or memoranda pertaining to or concerning the hiring of LITIGATION LAWYERS by CHRISTERPHOR HARBISON.

5.3 All documents relating to the employment or proposed employment of LITIGATION LAWYERS.

5.4 All correspondences, e-mails or memoranda (including all attachments and enclosures) sent by CHRISTERPHOR HARBISON, pertaining to or concerning the invoices and bills of LITIGATION LAWYERS, at any time since July 1, 2021.

5.5 All correspondence, e-mails or memoranda made by CHRISTERPHOR HARBISON, or sent to any other person pertaining to or concerning LITIGATION LAWYERS' representation or billing of CHRISTERPHOR HARBISON.

5.6 All correspondence, e-mails and memoranda (including attachments and enclosures) regarding the actions or lawsuit between CHRISTERPHOR HARBISON and Patriots Bank at any time since July 1, 2021.

#### **VI. MISCELLANEOUS**

6.1 All computerized records, discs or printouts containing or storing any of the documents or records requested in paragraphs 1.1 through 5.6 above.

6.2 All indexes, file numbers or retrieval information reflecting any of the documents or materials requested in paragraphs 1.1 through 5.6 above.

IN THE CIRCUIT COURT OF THE 17TH  
JUDICIAL CIRCUIT IN AND FOR  
BROWARD COUNTY, FLORIDA

CASE NO.

LITIGATION LAWYERS, PROFESSIONAL  
ASSOCIATION, a Florida professional  
corporation,

Plaintiff,

vs.

CHRISTERPHOR HARBISON, individually,  
and REGINA HARBISON, individually,

Defendants.

---

**PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS  
AND THINGS TO DEFENDANT, REGINA HARBISON**

COMES NOW the Plaintiff, LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION, and hereby serves its First Request for Production upon the Defendant, REGINA HARBISON, an individual, and requests that you to produce and make available for inspection or duplication at Litigation Lawyers, Professional Association, 2881 E. Oakland Park Boulevard, Suite 434, Fort Lauderdale, Florida 33306, the documents, specified herein, which are in your possession, custody, or control or in the possession, custody or control of your agent(s), employee(s), or attorney(s). You are requested to make such production in accordance with the Fla. R. Civ. P. 1.350, within 45 days of service of this request, to the undersigned counsel.

DATED on this 29<sup>th</sup> day of September, 2023.

LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION  
2881 E. Oakland Park Boulevard, Suite 434  
Fort Lauderdale, Florida 33306  
Tel: (954) 356-0496  
Tel: (954) 673-5444  
Email: [omamir@omamir.com](mailto:omamir@omamir.com)  
Email: [omamir503@gmail.com](mailto:omamir503@gmail.com)  
Email: [courtfilings@litlawyers.com](mailto:courtfilings@litlawyers.com)

By: Ofer M. Amir, Esq.  
Ofer M. Amir, Esq.  
Florida Bar No. 929530

**SCHEDULE "A"**  
**DEFINITIONS AND INSTRUCTIONS**

As used herein:

- A. The term "person" means any natural person or any entity, including, without limitation, any individual, firm, corporation, company, association, partnership, business, public agency, department, bureau, board, commission or any other form of public, private or legal entity. Any reference herein, whether specific or within the term "person", to any public or private company, partnership, association or other entity includes such entities subsidiaries and affiliates and the entity's and it's subsidiaries' and affiliates' present and former directors, officers, employees, attorneys, agents or anyone acting for any of them at their direction, or under their control.
- B. The term "writing" includes, but is not limited to, books, records, letters, telegrams, notes, memoranda, diaries, worksheets, computations, tabulations, financial statements and drafts of any of the foregoing, whether originals or copies and in whatever language, and all other tangible things on which words, figures, notations or sounds are recorded in writing or by any other means, and any such material underlying, supporting or used in the preparation thereof.
- 1. The term "identify" or "state".
  - (1) when used with reference to an individual person, means to state his full name, his position and business affiliation at that time referred to, his last known position and business affiliation, his last known residence and business addresses and his last known residence and business telephone numbers;
  - (2) when used with reference to a firm, partnership, corporation, association or other business enterprise, means to state its full name, address and telephone number; and,
  - (3) when used with reference to a writing, means
    - (a) to state its date, author, addressee, recipient and type (e.g., book, record, letter, memorandum, etc., or some other means of identifying it);
    - (b) to state its present location and custodian; and,
    - (c) either to state the substance thereof or to annex to and incorporate in the answer to these Interrogatories a true and correct copy thereof.
- D. The term "documents" or "correspondence" as used herein, means and includes originals (or copies if originals are unavailable) of all writings, records, all written, printed, typed or graphic matter and all tangible things of every type, kind and descriptions, however produced, copied or reproduced, whether draft or final, redrafted, executed, erased or otherwise defaced or

mutilated, from whomever and wherever obtained, including without limitation, any and all of the following: abstracts, accruals, acknowledgments, adding machine tapes, advertisements in any newspapers, magazines for trade journals, affidavits, agent of record letters, agreements, analyses, annual reports, applications, appointment books, appointment records, appraisals, articles, articles of incorporation and amendments thereto, audio recordings whether or not transcribed, audit programs, audit instructions and other audit materials, audit reports, balance sheets, bids, filing sheets, filing summaries, billings, bills, bills of lading, binders, blanks, books, books of account, brochures, budgets, by-laws and amendments thereto, cablegrams, calendars, cash flow projections, certificates, certificates of deposit, change orders, charters, charts, checks, checking account records, circulars, commitment letters, communications, compilations, computer cards, computer cassettes, computer disks, computer printouts, computer programs, computer readouts, computer tapes, confessions, confirmations and responses to confirmations, contracts, corporate documents, correspondence, court pleadings, covenants, credit analyses and reports, data compilations from which information can be obtained or translated through detection devices, data processing cards, disks and tapes or computer-generated printouts, output or other interpretations thereof, date records, delivery records, desk calendars, diaries, drafts, draw or funding requests, drawings, electronic mail, entries, estimates, expense records of reports, field notes, files, filings or records, films, financial analyses, financial statements, forms and form documents, graphs, handbooks, handwritten notes or transcripts of such notes, income statements, indices, instruments, inter-office communications, inventory tags and records, invoices, itemizations, joint venture agreements, journals, leases, ledgers, letters, licenses, liens, logs, mail receipts (registered or certified), management reports, manuals, maps, market studies, meeting reports, memoranda, memoranda of all conversations of any kind and by any means (including telephone), mortgages, minutes, newspapers, magazines or trade journals, articles or advertisements, notations, notebooks, notes, offers, operating statements, opinions, order forms, orders, pamphlets, payroll records, permits, personal statements or interviews or summaries thereof, personnel files, photocopies, photographs, pictures, plans, plats, pocket calendars and diaries, press releases, pro formas, projections, proposals, prospectuses, publications, purchase orders, releases, receipts, recordings, records, records of account, regulations, rent rolls, reports, requests, requisitions, research, resolutions, reversals, scraps of paper, security instruments, sketches, specifications, stock certificates or records, studies, submissions, summaries, tapes or tape recordings or transcripts thereof, tax returns and records, telecopies, telecopy coversheets, telegrams, telephone bills, records or invoices, telexes, texts, time records, time slips, title reports, policies and commitments, training manuals, transcripts, travel records, receipts and vouchers, treasury bills, valuations, video recordings, warehouse receipts, wire records or transfers, writings or work papers, as well as any other matter or media similar to any of the



foregoing, however denominated, along with all non-identical (or, by reason of subsequent annotation, no longer identical) copies, drafts or versions thereof and all copies thereof containing any commentary, notations or markings whatsoever.

- E. The term “all documents” means every document or group of documents or communications, as defined, known to you, and every such document or communication which can be located or discovered by diligent efforts. It excludes documents which were previously produced in the course of discovery in this action.
- F. The term “address” means the last known home and business address of a person or other entity.
- G. The term “Plaintiff” as used herein, refers to LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION, a Florida Corporation, or where applicable, its parent, subsidiary or other related or affiliated organizations, and its officers, directors, employees, consultants, representatives, attorneys, accountants and agents, and all other persons acting or purporting to act on its behalf.
- H. The term “Defendant” as used herein, refers to REGINA HARBISON, or where applicable, his employees, consultants, representatives and agents, and all other persons acting or purporting to act on her behalf.
- I. The term “actions” or “lawsuits” means the numerous lawsuits filed between Patriots Bank and its Court Appointed Receiver and either Regina Harbison, Christerphor Harbison or any of their affiliated or related business entities.
- J. The term “relating to” means containing, constituting, showing, mentioning, reflecting or pertaining or referring in any way, directly or indirectly to, and is meant to include, among other documents, documents underlying, supporting, now or previously attached or appended to or used in preparation of any document called for by each request.
- K. The conjunctions “and” and “or” shall each be individually interpreted in every instance to mean “and/or” and shall not be interpreted disjunctively to exclude any information otherwise within the scope of any request.
- L. Each numbered request is to be responded to separately and as thoroughly as possible. The fact that investigation is continuing or that discovery is not complete shall not be used as an excuse for failure to respond to each request as fully as possible. The omission of any document, thing or item of information shall be deemed a representation that such document is not known

to Defendant(s), their counsel or other representatives at the time of the service of the response.

### **TIME LIMITATION**

Unless otherwise specifically indicated in any individual request for production, the time period to which these requests relate is the period beginning from July 1, 2021 to to the date of your production in response to this request.

### **INSTRUCTIONS**

1. The documents or categories of documents which you contend are responsive to each separate request and their location should be set forth in your written request pursuant to the Florida Rules of Civil Procedure. Documents responsive to each request should be produced in the order in which they are kept in the ordinary course of your business activities.

2. If you object in part to any request for production, please produce the portion of the documents requested to which you do not object and state your objection to the remainder.

3. When producing any documents not legible to the unaided human eye, also produce the means for translating it to a form legible to the human eye and instructions for translation.

4. If the attorney/client privilege or the work product privilege is asserted in response to any production request, then identify the document by its:

- a. date;
- b. general nature, e.g., letter, memorandum, photograph, computer printout, etc.;
- c. subject matter;
- d. author or originator;
- e. each person indicated as an addressee or copy recipient, or known or believed by Defendant(s) to have received a copy of the document;
- f. present custodian of each copy of the document;
- g. alleged ground or grounds for withholding production; and,
- h. sufficient particulars to allow Plaintiff to evaluate the claim of privilege or immunity asserted.

5. Produce the original and each copy in your possession, custody or control of the documents and categories of documents designated.

6. With respect to each document requested herein which has been lost, destroyed or otherwise disposed of since its preparation or receipt, provide the following information separately as to each document:

- (a) general description of the subject matter;
- (b) author;
- (c) recipient(s);
- (d) date;
- (e) last custodian of the document; and,
- (f) the circumstances under which the document was lost, destroyed or otherwise disposed of;

**SPECIAL INSTRUCTIONS FOR DATA STORED OR MAINTAINED IN  
ELECTRONIC, ELECTROMAGNETIC, PHOTOGRAPHIC, DIGITAL, OR  
MECHANICAL FORM**

These requests cover all documents, including electronically-stored information (ESI), in, or subject to, your possession, custody, or control, including, but not limited to, all documents (including ESI) that you have the ability to obtain, that are responsive, in whole or in part, to these requests. Our client is prepared to discuss the terms of production of ESI. In the absence of an agreement, ESI should be produced in the following form: (1) all documents should be produced as Type IV single page tiff files and name each tiff file with the Bates number labeled on the corresponding page; (2) documents should not be divided across folder directories and an image load file (e.g., .LFP file) that defines all document page breaks should be provided; (3) the extracted full text from the body of each document should be produced as a .txt file, and for each document scanned from hardcopy or containing redactions, the OCR should also be produced as a .txt file. Our client specifically requests that you produce a separate .txt file for each electronic or scanned document and that you name each .txt file with the Bates number labeled on the first page of each corresponding document (e.g., BATES0000001.txt). Our client further requests that you produce in the form of a .dat file extracted metadata for each of the following metadata fields for each electronic document:

1. DOCID	Image bates number
2. MSGID	Message ID 6
3. TO	To
4. FROM	From
5. CC	CC
6. BCC	BCC
7. SUBJECT	Subject
8. EMAIL-BODY	Email Body
9. FOLDERNAME	Folder Name
10. DATECREATED	Date Created
11. DATESAVED	Date Saved
12. DATERCVD	Date Received
13. TIMERCVD	Time Received
14. DATESENT	Date Sent
15. TIMESENT	Time Sent
16. INTMSGID	Internet Message ID
17. APPLICATION	Application

18. ATTACHRANGE	Attachment range
19. ATTACHTITLE	Attachment Title
20. ATTACHCOUNT	Attachment Count
21. CONVTHREAD	Conversation Thread
22. CUSTODIAN	Custodian of collection
23. MEDIA Edoc,	Email, Attachment
24. DOCLINK	Link to native file
25. ATTACHID	Attachment bates id
26. PARENTID	Parent bates id
27. FOLDER	Folder path
28. FILENAME	File Name
29. AUTHOR	File Author
30. FILEEXT	File Extension
31. HASHCODE	MD5 Hash
32. CUSTODIAN	Source or custodial information

Our client specifically reserves the right to request the production of additional metadata fields and/or to request the production of ESI in native format if the imaged form does not provide adequate detail or could be better understood in native electronic form. To the extent that any documents are produced in native electronic form, you should name each native file with the Bates number labeled on the first page of the native file's corresponding imaged file and the appropriate file extension (e.g., BATES0000001.xls).

With respect to electronic mail, when producing responsive electronic mail, the electronic mail should be produced in a format that includes the originating address, all copies and blind copies, the date and time of transmission, each attachment, the mailbox or other post office storage location of every copy, and all replies and/or forwards of the electronic mail.

#### **SPECIAL INSTRUCTIONS AGAINST SPOILIATION OF EVIDENCE**

Accordingly, our client demands that you continue to take all steps necessary to preserve all documents, records, data and files that may be relevant to this dispute including, without limitation, documents, records, data and files kept by electronic, electromagnetic, photographic, digital or mechanical means, whether or not contained in current, backup or archival files of personal computers and networks or on hard drives, diskettes, CD-ROM disks, magnetic tapes, back-up tapes, or Zip and Jazz cartridges.

You must cease and desist from overwriting existing data, or running data compression or defragmentation routines or "shredder programs" on any such documents, records, data or files before full compliance with the discovery requests made herein is determined so as to prevent the inadvertent alteration or deletion of such documents, records, data and files. All metadata should be preserved.

**SCHEDULE "A"**

**DOCUMENTS AND THINGS TO BE PRODUCED**

**I. CONTRACTS AND AGREEMENTS**

1.1 All contracts, engagement letters and agreements between REGINA HARBISON and LITIGATION LAWYERS, together with any modifications thereof.

**II. BILLINGS AND PAYMENT RECORDS**

2.1 All invoices, bills, correspondence, itemized billing statements, billing cover letters and other records, pertaining to work done by LITIGATION LAWYERS, which were received by REGINA HARBISON.

2.2 All records and documents reflecting any retainer or payments made, for legal services rendered by LITIGATION LAWYERS, including without limitation, copies of all checks (fronts and backs), and a copy of all receipts for the payment of attorneys' fees and costs, to, or from, LITIGATION LAWYERS.

2.3 All markups or notes made by REGINA HARBISON, on or concerning any invoices, itemized billing statements and billing cover letters of LITIGATION LAWYERS.

**III. NOTES AND MEMORANDUMS OF MEETINGS; PHONE CALLS**

3.1 All notes or memorandum created by REGINA HARBISON, including hand-written, typed or computerized notes and records, concerning any meeting, conferences, or phone conversations, at any time from July 1, 2021, with any personnel of the LITIGATION LAWYERS.

3.2 All notes (handwritten or electronic) made by REGINA HARBISON, in regard to any meeting or phone conversation with LITIGATION LAWYERS.

3.3 All notes (handwritten or electronic) made by REGINA HARBISON, in regard to any meeting or phone conversation or e-mail communication with any person, concerning LITIGATION LAWYERS.

3.4 All text or records of phone message(s) made by you pertaining to or concerning LITIGATION LAWYERS' representation of REGINA HARBISON.

#### **IV. COURT FILINGS AND COMMUNICATIONS**

4.1 All documents filed with the Courts, in the actions and lawsuits, involving Patriots Bank and its Court Appointed Receiver, by LITIGATION LAWYERS or by other counsel for REGINA HARBISON.

4.2 Copies of all court filings, together with pertinent correspondence, emails or other papers, relating to the actions and lawsuits, with Patriots Bank, and its Court Appointed Receiver, which were sent by Regina Harbison or received from LITIGATION LAWYERS.

#### **V. CORRESPONDENCE**

5.1 All correspondence, letters, facsimiles, memoranda, text messages, or emails (including all attachments and enclosures) between REGINA HARBISON, and LITIGATION LAWYERS from July 1, 2021, through the present.

5.2 All correspondence, e-mails or memoranda pertaining to or concerning the hiring of LITIGATION LAWYERS by REGINA HARBISON.

5.3 All documents relating to the employment or proposed employment of LITIGATION LAWYERS.

5.4 All correspondences, e-mails or memoranda (including all attachments and enclosures) sent by REGINA HARBISON, pertaining to or concerning the invoices and bills of LITIGATION LAWYERS, at any time since July 1, 2021.

5.5 All correspondence, e-mails or memoranda made by REGINA HARBISON, or sent to any other person pertaining to or concerning LITIGATION LAWYERS' representation or billing of REGINA HARBISON.

5.6 All correspondence, e-mails and memoranda (including attachments and enclosures) regarding the actions or lawsuits between REGINA HARBISON and Patriots Bank at any time since July 1, 2021.

#### **VI. MISCELLANEOUS**

6.1 All computerized records, discs or printouts containing or storing any of the documents or records requested in paragraphs 1.1 through 5.6 above.

6.2 All indexes, file numbers or retrieval information reflecting any of the documents or materials requested in paragraphs 1.1 through 5.6 above.

IN THE CIRCUIT COURT OF THE 17TH  
JUDICIAL CIRCUIT IN AND FOR  
BROWARD COUNTY, FLORIDA

CASE NO.

LITIGATION LAWYERS, PROFESSIONAL  
ASSOCIATION, a Florida professional  
corporation,

Plaintiff,

vs.

CHRISTERPHOR HARBISON, individually,  
and REGINA HARBISON, individually,

Defendants.

---

**COMPLAINT**

COMES NOW, Plaintiff, LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION,  
by and through its undersigned attorneys, and sues the Defendants, CHRISTERPHOR HARBISON  
and REGINA HARBISON (hereinafter collectively referred to as the "Defendants"), and as grounds  
therefore, states as follows:

**COMMON ALLEGATIONS**

1. Plaintiff, LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION  
("Litigation Lawyers" or "Plaintiff" or "Law Firm" or "Florida Attorney") is a Florida professional  
corporation with its principal place of business located in the City of Ft. Lauderdale, Broward  
County, Florida

2. Defendant, CHRISTERPHOR HARBISON a/k/a Chris Harbison is sui juris. He is  
an individual residing in the State of Missouri.



3. Defendant, REGINA HARBISON a/k/a Gina Harbison is sui juris. She is an individual residing in the State of Missouri.

4. On or about August 27, 2021, Law Firm and Defendants entered into an Employment and Retainer Agreement whereby Litigation Lawyers, would perform legal services for Defendants. The Defendants signed and sent the executed agreement to Plaintiff's office in Florida. A true and correct copy of the Employment and Retainer Agreement is attached hereto as Exhibit "A" and incorporated herein.

5. Defendants are subject to the jurisdiction of the Florida courts, in accordance with Fla. Stat. §48.193, since at all times material hereto:

- (a) Defendants entered into a contract in the State of Florida and breached it;
- (b) Defendants have made payments to the Law Firm in Broward County, Florida;
- (c) Defendants breached a contract in the State of Florida by refusing to pay amounts owed pursuant thereto;
- (d) Defendants have directed, guided and participated in meetings in the State of Florida and have participated in phone calls with their Florida attorneys and staff in the State of Florida;
- (e) Defendants benefitted from or have been recipients or the participants to work performed by their Florida attorney and staff in the State of Florida;
- (f) Defendants engaged in substantial and not isolated, business activities in the State of Florida; and
- (g) Defendants have owned real property in the State of Florida.

6. The parties agreed that payments were to be made to the Law Firm at its business address in Broward County, Florida. Commencing in August of 2021, Defendants made payments to the Law Firm in Broward County, Florida.

7. Commencing in August of 2021, the Law Firm performed legal services for the

Defendants up to January of 2023.

8. The Law Firm delivered copies of the monthly statements and invoices for services to the Defendants. True copies of the statements and invoices are attached as Composite “Exhibit B” hereto, and incorporated herein.

9. No objections were made by the Defendants to these monthly statements and invoices within a reasonable time. After the receipt of the invoices and statements, Defendants made partial payments to the Law Firm.

10. Defendants failed or refused to pay the invoices in full and failed or refused to tender full payment to Plaintiff.

11. All conditions precedent and statutory prerequisites to the bringing of this action have occurred or have been waived or excused.

**COUNT I**  
**BREACH OF CONTRACT**

12. This is an action for breach of contract by the Law Firm against the Defendants, CHRISTERPHOR HARBISON and REGINA HARBISON, for damages in excess of Fifty Thousand Dollars (\$50,000.00), exclusive of interest, attorney’s fees and costs.

13. Plaintiff realleges, readopts, and reincorporates Paragraphs 1 through 11 of the Complaint, as if fully set forth herein.

14. On August 27, 2021, Law Firm entered into a written Employment and Retainer Agreement with Defendants, a true and correct copy of which is attached as Exhibit “A” hereto and incorporated herein.

15. The litigation matters were referenced in the agreement and the matters were identified as File No. 3062.1 by the Law Firm for purposes of filing and billing.

16. Plaintiff rendered legal services to Defendants and their related business entities, and at their request, pursuant to the Employment and Retainer Agreement.

17. Between August of 2021 and January of 2023, Plaintiff rendered legal services on behalf of Defendants in legal matters involving their affiliated and related parties and themselves in various actions. Plaintiff sent numerous bills and statements to the Defendants.

18. Pursuant to the Employment and Retainer Agreement, Defendants agreed to pay for all legal services rendered by the Law Firm.

19. Defendants made partial payments through the early part of 2023, but failed to make payments thereafter.

20. The amount of fees and costs that are due and owing to the Law Firm, is reflected in the statements and invoices sent to Defendants, together with pre-judgment interest. True and correct copies of the statements and invoices rendered to Defendants are attached as Composite Exhibit "B" hereto.

21. Defendants have defaulted and materially breached the contract by failing to make payments in accordance with the Employment and Retainer Agreement. The Law Firm has been damaged by the default and breach. The amount due and unpaid is in excess of \$469,772.04, plus pre-judgment interest.

22. The Law Firm has performed all statutory prerequisites and conditions precedent, or they have been waived or excused, and Plaintiff is entitled to recovery herein.

23. The Law Firm is obligated to pay the undersigned attorney a reasonable attorney's fee for which Defendants are liable in accordance with a written contract. The Plaintiff is entitled to recover attorney's fees from Defendants. In Paragraph 4 of the Employment and Retainer

Agreement, it states in pertinent part, as follows:

The Clients agree to pay said bills within ten (10) days . . . In the event of a default in payment hereunder by the Clients, whether suit be filed or not, the Law Firm shall be entitled to recover from the Clients, a reasonable attorney's fee, for all litigation, including, but not limited to, trial and appeal, plus costs of the action.

**WHEREFORE**, the Plaintiff LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION requests that this Court enter judgment in favor of the Law Firm and against the Defendants, CHRISTERPHOR HARBISON and REGINA HARBISON, awarding damages in excess of \$469,772.04, together with interest (pre-judgment and post-judgment), attorney's fees and costs, and that this Court grant such other and further relief as the Court deems just and proper.

**COUNT II**  
**OPEN ACCOUNT**

24. This is an action by the Law Firm against the Defendants, CHRISTERPHOR HARBISON and REGINA HARBISON, for open account and for damages in excess of Fifty Thousand Dollars (\$50,000.00) exclusive of attorney's fees, interest, and costs.

25. The Law Firm realleges, readopts and reincorporates Paragraph 1 through 11 of the Complaint as if fully set forth herein.

26. Before the institution of this action, the Law Firm had transactions with the Defendants. The Law Firm provided legal professional services to Defendants, with respect to which a debt was incurred. The Plaintiff delivered itemized invoices and account statements to Defendants. True and correct copies of the account statements and itemized invoices are attached as Composite Exhibit "B" hereto.

27. An account existed between the Law Firm and the Defendants in which the parties had a series of charges, payments and adjustments. Plaintiff rendered the invoices and statements to the

Defendants, and they did not object to the invoices or statements or the resulting balance. After receipt of invoices and statements, Defendants made partial payments to the Law Firm.

28. Defendants owe the Plaintiff in excess of \$469,772.04, together with prejudgment interest.

29. The Law Firm is obligated to pay the undersigned attorney a reasonable attorney's fee for which Defendants are liable in accordance with the written contract.

**WHEREFORE**, the Plaintiff, LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION, requests that this Court enter judgment in favor of the Law Firm and against the Defendants, CHRISTERPHOR HARBISON and REGINA HARBISON, for in excess of \$469,772.04, together with interest (pre-judgment and post-judgment), attorney's fees and costs, and that this Court grant such other and further relief as the Court deems just and proper.

**COUNT III**  
**ACCOUNT STATED**

30. This is an action by the Law Firm against the Defendants, CHRISTERPHOR HARBISON and REGINA HARBISON, for account stated and for damages in excess of Fifty Thousand Dollars (\$50,000.00), exclusive of interest, attorneys' fees and costs.

31. The Law Firm realleges, readopts and reincorporates Paragraphs 1 through 11 of the Complaint, as if fully set forth herein.

32. Defendants entered into a written Employment and Retainer Agreement with the Law Firm. See Exhibit "A" attached hereto. Before the institution of this action, the Law Firm rendered and provided legal professional services to Defendants. They had business transactions between them. Before the institution of this action, the Law Firm provided numerous monthly account statements and invoices to Defendants reflecting, among other information, work completed since the

preceding billing period, the total amount due on the account, and the payment due. True and correct copies of the account statements and invoices are attached as Composite Exhibit "B" hereto.

33. No objections were made by the Defendants to these monthly statements and invoices within a reasonable time. After the receipt of the invoices and statements, Defendants made partial payments to the Law Firm.

34. Defendants expressly or implicitly promised to pay to the Law Firm the outstanding balance and the amount set forth in the statement.

35. On or before January 31, 2023, Defendants agreed to the resulting balance. Defendants have failed to pay the Law Firm all of the amount owed under the account. Defendants owe the Law Firm in excess of \$469,772.04, together with pre-judgment interest.

36. The Law Firm is obligated to pay the undersigned attorney a reasonable attorney's fee for which Defendants are liable in accordance with the contract.

**WHEREFORE**, Plaintiff requests that this Court enter judgment in favor of Plaintiff, LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION, and against the Defendants, CHRISTERPHOR HARBISON and REGINA HARBISON, for in excess of \$469,772.04, together with interest (pre-judgment and post-judgment), attorney's fees and costs, and that this Court grant such other and further relief as the Court deems just and proper.

**COUNT IV**  
**QUANTUM MERUIT**

37. This is an action by the Law Firm against the Defendants, CHRISTERPHOR HARBISON and REGINA HARBISON, for quantum meruit and for damages in excess of Fifty Thousand Dollars (\$50,000.00), exclusive of interest, attorney's fees and costs, and is pled in the alternative to Count I.

38. The Plaintiff realleges, readopts and reincorporates Paragraphs 1 through 11 of the Complaint, as if fully set forth herein.

39. At all times material hereto, Defendants met with personnel of the Law Firm and were aware of the fact that the Law Firm was performing legal services for them. The Law Firm copied Defendants with pleadings, motions, memoranda, correspondence, and other papers in the cases.

40. The Law Firm conferred a benefit on Defendants in that it provided legal services, all of which were knowingly accepted by them.

41. The reasonable value of the legal services for which the Law Firm has not been paid, together with expenses, is in excess of \$469,772.04, together with pre-judgment and post-judgment interest, attorneys' fees and costs.

42. The Law Firm has demanded payment, but Defendants have failed or refused to pay.

43. The principal amount in excess of \$469,772.04, together with pre-judgment interest, and costs, remains unpaid to the Law Firm.

**WHEREFORE**, Plaintiff LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION, requests that this Court enter judgment in favor of the Law Firm and against the Defendants, CHRISTERPHOR HARBISON and REGINA HARBISON, together with interest (pre-judgment and post-judgment) and costs, and that this Court grant such other and further relief as the Court deems just and proper.

**COUNT V**  
**UNJUST ENRICHMENT**

44. This is an action by the Law Firm against the Defendants, CHRISTERPHOR HARBISON and REGINA HARBISON, for unjust enrichment and for damages in excess of Fifty Thousand Dollars (\$50,000), exclusive of interest, attorneys' fees, and costs, and is pled in the alternative to Count I.

45. The Law Firm realleges, readopts and reincorporates Paragraphs 1 through 11 of the Complaint, as if fully set forth herein.

46. At all times material hereto, Defendants met with personnel of the Law Firm and were aware of the fact that the Law Firm was performing all legal services in compliance with the Employment and Retainer Agreement. The Law Firm copied Defendants with pleadings, motions, memoranda, correspondence, and other papers in the cases.

47. At all times material hereto, Defendants received the benefits of and accepted the benefits of all legal services provided by the Law Firm.

48. It would be unjust for Defendants to retain the benefits that they received as a result of the performance of legal services provided by the Law Firm, without paying the amount in excess of \$469,772.04, together with pre-judgment and post-judgment interest and costs. Defendants have been unjustly enriched.

49. The Law Firm is obligated to pay the undersigned attorney a reasonable attorney's fee. The Law Firm has incurred attorney's fees and costs, for which Defendants are liable under the Employment and Retainer Agreement attached hereto as Exhibit "A".



**WHEREFORE**, Plaintiff, LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION, requests that this Court enter judgment in favor of the Law Firm and against the Defendants, CHRISTERPHOR HARBISON and REGINA HARBISON, together with interest (pre-judgment and post-judgment), attorney's fees and costs, and that this Court grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION  
2881 East Oakland Park Boulevard, Suite 434  
Fort Lauderdale, FL 33306  
Tel: (954) 673-5444  
Tel: (954) 356-0496  
E-Mail: [courtfilings@litlawyers.com](mailto:courtfilings@litlawyers.com)  
E-Mail: [omamir@omamir.com](mailto:omamir@omamir.com)  
E-Mail: [omamir503@gmail.com](mailto:omamir503@gmail.com)

By: /s/ Ofer M. Amir, Esq.  
Ofer M. Amir, Esq.  
Florida Bar No.: 929530

# EXHIBIT

# A

**EMPLOYMENT AND RETAINER AGREEMENT  
(HOURLY)  
LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION**

**CHRISTOPHER HARBISON and REGINA HARBISON** (hereinafter referred to as "Clients"), hereby retains the Law Office of **LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION** (hereinafter referred to as the "Law Firm"), to represent the Clients regarding:

- (a) All matters pertaining to the defense of Patriots Bank Receivership Litigation in the Circuit Court of Washington County, Missouri, Case No: 21 WA-CC00250;
- (b) In the receivership action, the Court has entered an Order filed July 22, 2021, in regard to business entities, affiliated with the Clients, including, but not limited to: Black River Motel, LLC, CRAZ Investments, LLC, CHAB Development, LLC and Jonesberg Sawmill & Pallet, Inc. (collectively the "Business Entities"). Clients have requested that Law Firm provide a defense in the receivership case for these business entities and have agreed to pay for the defense;
- (c) All matters pertaining to the action brought by Patriots Bank against Christopher Harbison and Regina Harbison in the Eastern District of Missouri, Case No:4:21-CV-00991-HEA;
- (d) All matters pertaining to the appeal (if permitted) from the Order Appointing a Receiver on July 22, 2021.

The matters listed above are collectively referred to herein as the "Matters".  
(Our File No: 3062.1)

The Law Firm is retained, employed and empowered to institute on the Client's behalf such action as may be advisable in its professional judgment, including the taking of an appeal after final judgment therein, and to effect a final compromise, subject to the Client's approval, in the above matter on the following terms and conditions. This Agreement, including its terms and conditions, shall also apply to all matters in the future or hereafter handled for the Clients on an hourly or fixed basis.

1. In consideration of the above services rendered and to be rendered by the Law Firm, the Clients hereby agree to pay to the Law Firm a fee for professional services rendered, on an hourly basis, as follows:

At the rate for Stephen Rakusin, Esq. at \$480.00 per hour and for other personnel at the rates reflected on Exhibit "B" which may include, without limitation, non-litigation time spent in the initial and subsequent office and telephone conferences with the Law Firm, drafting and filing of pleadings, arrangements for service of process, correspondence and communications with the Clients, opposing counsel and other parties, research and preparation, factual investigation, travel and all other matters necessary to the conduct of the representation, court appearances, motion hearings, other hearings and depositions.

2. If, during the course of the Law Firm's representation of the Clients, costs or expenses are incurred on behalf of the Clients, the Clients agree to pay all costs and expenses

process, fees of expert witnesses and investigators, court reporter costs, costs of transcripts or reports, witness statements, expenses of discovery proceedings, certified copies of court documents, publication costs, long distance telephone calls, photocopying charges, scanning, computerized storage, record storage and retrieval and all other expenses or costs directly incurred in the investigation, representation or litigation of the aforementioned matter. These costs, if any are incurred, are in addition to and exclusive of the aforementioned attorney's fees. The Law Firm may, but shall not be obligated to, advance these costs and expenses on the Clients' behalf, and in that case, these costs and expenses will be reimbursed to the Law Firm as set forth herein. Employment of any expert witness or investigators will be at the Law Firm's discretion, and the persons or firms will report only to the Law Firm.

3. In connection with the Clients' representation in this matter by the Law Firm, the Clients are making a refundable deposit toward attorney's fees in the amount of (\$75,000.00) and other good valuable consideration, and a cost deposit in the amount of N/A. The Clients understand that amounts in excess of any refundable deposit made toward attorney's fees shall be applied toward the appropriate fee due the Law Firm for professional services rendered hereunder. In all cases, cost deposits are retained in the Law Firm's Trust Accounts and do not accrue interest. At the conclusion of this representation of the Clients by the Law Firm, any unused deposit funds will be returned to the Clients.

4. The Law Firm shall provide periodic billings which will itemize the time spent on the Clients' behalf (if the representation is on an hourly fee basis), the services performed and the charges due therefor, as well as any costs incurred. The Clients agree to pay said bills within ten (10) days. Any billings or statements not paid in full within fifteen (15) days of the date of said billings or statements shall bear interest at the legal rate from the date said billings or statements were rendered until the date paid. In the event of a default in payment hereunder by the Clients, whether suit be filed or not, the Law Firm shall be entitled to recover from the Clients, a reasonable attorney's fee for all litigation, including, but not limited to, trial and appeal, plus costs of the action, and shall have all general, possessory or retaining liens, or charging liens on the claim or cause of action, on any sum collected by settlement. The Clients agree to carefully read all billing statements and promptly notify the Law Firm, in writing, of any claimed errors or discrepancies, within fifteen (15) days from the date of the statement. If the Law Firm does not receive such notification in writing from the Clients, it is presumed that the Clients agree with the correctness, accuracy and fairness of the billing statement.

5. The parties agree to cooperate in the prosecution of this case in a manner most consistent with Clients' goals, including cost efficiency in that defense. In addition to the specific provisions above, Law Firm agrees to regularly advise Clients of the status of the case; to copy Clients with all court pleadings and correspondence; and to consult with Clients regarding extraordinary expenses for projects that Law Firm may contemplate performing in the course of this engagement. No settlement of any nature shall be made relating to the aforesaid matter on behalf of the Clients without the complete approval of the Clients, and all offers of settlement shall be communicated to the Clients.

6. The Law Firm may, at its discretion and expense, employ associate counsel or co-counsel to assist in the prosecution of the undersigned's claims. The parties agree that Law Firm is authorized to use the services of outside attorneys to perform certain services to assist in the defense of the litigation when such out-sourcing will likely result in savings to Clients. Stephen Rakusin, Esq. is not licensed to practice law in the State of Missouri or in the Federal District Court for the Eastern District of Missouri. In order to appear in any of the above-referenced Matters, the Courts will have to accept counsel's pro hac vice applications and authorize him to appear and argue as a visiting attorney.

In any event, Clients will need to employ and pay local counsel, licensed to appear in Missouri and in the pertinent Courts, in accordance with the attached Rule 9.03 of the Missouri Bar Rules. (Exhibit "C")

If, for any reason, Stephen Rakusin, Esq. is not permitted to personally appear, he shall provide consulting and support services for counsel of record in the pending Matters.

7. This Agreement comprises the entire contract between the undersigned and the Law Firm, and supersedes any prior understandings or written or oral agreements between the Law Firm and the Clients respecting the within subject matter.

8. The Clients will keep the Law Firm advised of their whereabouts at all times and shall provide a current telephone number if available, and shall appear on reasonable notice at any and all depositions and court appearances, and shall comply with all reasonable requests of the Law Firm in connection with the preparation and presentation of the defense of the claims and assertion of cause of action of the Clients, and the prosecution of any other work on behalf of the Clients. Clients warrant that they will pay for the legal services and expenses, as provided above, that it will use agents and employees to assist in the defense of the litigation and will make records available to the extent permitted by law, as required to assist in the defense.

9. In case any one or more of the provisions in this Agreement shall for any reason be held to be invalid, illegal or unenforceable in any respect, such invalidity, illegality or unenforceability shall not affect any other provision thereof and this Agreement shall be construed as if such invalid, illegal or unenforceable provision had never been contained herein.

10. Law Firm warrants that it shall use its best efforts to achieve the purpose of this engagement consistent with legal and ethical standards applicable thereto. Attorney does not warrant any particular result in the litigation, does not warrant that the services can be performed at any particular cost not within any particular period of time. The Law Firm has made no warranties as to the successful termination of this matter or cause of action, and all expressions which may have been made by the Law Firm to the Clients relative thereto are recognized as matters of the Law Firm's opinion only. In regard to the issue of prevailing party attorney's fees, I have reviewed information on the attached Exhibit "A".

11. This engagement shall conclude upon any one of the following events:
  - (a) Termination by Clients of the employment of Litigation Lawyers at any time in writing;
  - (b) Termination by Litigation Lawyers of its employment of Clients at any time in writing;
  - (c) Failure of client to timely pay an invoice according to the procedure set out above;
  - (d) Breach of this agreement in any respect by either party.

12. Clients have been informed that Stephen Rakusin, Esq. is a respondent in a Florida Bar disciplinary proceeding complaint, filed on August 13, 2021. There has been no adjudication of the complaint. However, among the potential sanctions are reprimand, suspension or disbarment. Clients understand that if there is an adjudication adverse to the attorney, and discipline is imposed, Clients may have to replace Stephen Rakusin, Esq. as counsel, either temporarily or permanently,

13. Additionally, you have been advised of a division of fees between this law firm and The Law Office of MosierValentine, PA for work performed on this matter. In exchange for assuming joint legal responsibility to the client for the representation and availability for consultation with the client, this law firm will pay to The Law Office of MosierValentine, PA a division of fees in the amount of 20% of the reasonable fees paid by the client to the law firm.

14. Clients agree that this Agreement can be executed in counterparts.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

We have read this Agreement, and we have been given an opportunity to ask any questions which we might have in order to aid in my complete understanding of the Agreement prior to signing the agreement, and we are satisfied with the terms of the Agreement.

EXECUTED ON THIS 27 day of August, 2021.

CHRISTOPHER HARBISON

By:   
CHRISTOPHER HARBISON

REGINA HARBISON

By:   
REGINA HARBISON

The terms of this Agreement are hereby accepted by the Law Firm, as of this 27 day of August, 2021, in Fort Lauderdale, Florida.

LITIGATION LAWYERS  
PROFESSIONAL ASSOCIATION

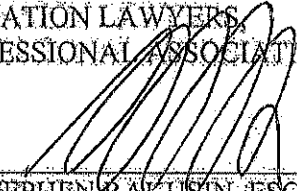
By:   
STEPHEN RAKUSIN, ESQ.  
PRESIDENT



EXHIBIT "A"  
ATTORNEY'S FEES

In certain areas of the law, attorney's fees are a recoverable element of a claim if allowed by statute or contract. Fees by statute may be mandatory or permissive.

If permissive, such as in certain types of collection actions or in certain types of landlord-tenant matters, they may be awarded to a prevailing party in the opinion of the court and as specified in the particular statute. They may not be awarded in every case.

In certain statutes, attorney's fees awards are mandatory such as in construction liens foreclosures and wage enforcement actions. This means that fees are awarded when:

- (a) the party prevails in the litigation; and
- (b) the case is adjudicated at trial or by motion.

The trial court may award a reasonable attorney's fees which may not necessarily be the same as those billed by the attorney. Moreover, as a practical matter, when a case is settled, the trial court does not generally get an opportunity to award fees. This has to be taken into account in determining the amount of an acceptable settlement.

Lastly, under no circumstances, does the Law Firm work for a court award of reasonable fees. Payment of all fee bills is required as set forth in the Employment Agreement.

CHRISTOPHER HARBISON

By: 

CHRISTOPHER HARBISON

Date: 8-27-21

REGINA HARBISON

By: 

REGINA HARBISON

Date: 8-27-21



**EXHIBIT "B"**  
**HOURLY BILLING RATE\***  
(As of August 1, 2021)

**LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION**

STEPHEN RAKUSIN	\$480/HOUR
LAW CLERKS	\$150/HOUR
PARALEGALS	\$180/HOUR
DEPOSITION AND TRANSCRIPT SUMMARIZERS	\$40/HOUR

There shall be no separate charges for secretarial, clerical and other non-attorney staff time.

CHRISTOPHER HARBISON

By:   
CHRISTOPHER HARBISON

Date: 8-27-21

REGINA HARBISON

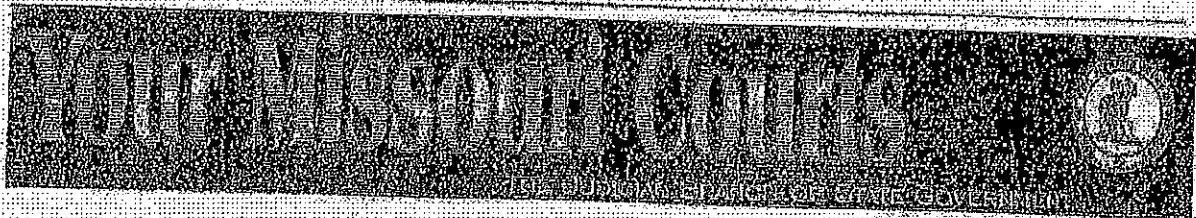
By:   
REGINA HARBISON

Date: 8-27-21

\*The Hourly Billing Rates are subject to increase at any time.

8/20/2021

Supreme Court Rules - Rule 9 - Rules Governing the Missouri Bar and the Judiciary - Practice of Law in the State; Visiting Attorney App...



## Clerk Handbooks

## Supreme Court Rules

Rule 9 - Rules Governing the Missouri Bar and the Judiciary - Practice of Law in the State; Visiting Attorney Appearing in a Particular Case	2021
Revised January 4, 2021	February 1, 2021

## 9.03 Visiting Attorney Appearing in a Particular Case

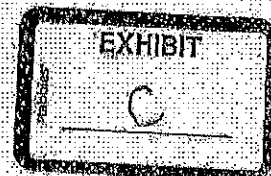
Any attorney who is not a member of The Missouri Bar may be permitted to appear and participate pro hac vice in a particular case in any court or administrative tribunal of this state under the following conditions:

- The visiting attorney is a member in good standing of the bar of another state or territory of the United States or of the District of Columbia;
- The visiting attorney is not under suspension or disbarment by the highest court of any state or territory of the United States or of the District of Columbia;
- The visiting attorney files with his or her initial pleading the receipt for the fee required by Rule 6.01(n) and a statement:

- Identifying every court of which he or she is a member of the bar;
- Certifying that neither the attorney nor any member of his or her firm is under suspension or disbarment by any such court; and
- Designating a member of The Missouri Bar who is authorized to practice law in the state under Rule 9.01(g) as associate counsel.

The designate associate counsel shall:

- Enter an appearance as an attorney of record;
- Sign all pleadings, briefs and other filed or served documents; and
- Unless excused by the judge or presiding officer, be present at all hearings.



8/20/2021

Supreme Court Rules - Rule 9 - Rules Governing the Missouri Bar and the Judiciary - Practice of Law in the State; Visiting Attorney Appe...

The visiting attorney by his or her appearance agrees to comply with the Rules of Professional Conduct as set forth in Rule 4 and become subject to discipline by the courts of this state.

(Adopted Feb. 1, 1972, eff. Sept. 1, 1972, Amended June 27, 1980, eff. Aug. 1, 1980; April 21, 1988, eff. Jan. 1, 1989. Amended Nov. 26, 2002, eff. Jan. 1, 2003. Amended March 30, 2004, eff. July 1, 2004. Amended Oct. 23, 2013, eff. Oct. 23, 2013; Jan. 26, 2021, eff. Jan. 26, 2021.)

# **COMPOSITE EXHIBIT B**

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

September 23, 2021

gina@harbisonlumber.com

Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:

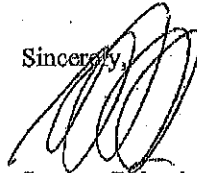
Enclosed please find my bill for services rendered in the above styled case for the period of August 1, 2021 through August 31, 2021.

The total amount due for fees is \$20,313.60. The total amount due for costs this billing period is \$36.40. The total amount due for fees and costs this billing period is **\$20,350.00**.

**The total amount now due is \$0.00.**

This amount was deducted from your retainer. Your prompt payment of these items has been greatly appreciated.

Sincerely,



Stephen Rakusin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

Credit Card # \_\_\_\_\_ Exp. Date / CVV Code: \_\_\_\_\_

Remit payment to:

SIGNATURE \_\_\_\_\_ (AS IT APPEARS ON THE CARD)

PRINT NAME \_\_\_\_\_ (AS IT APPEARS ON THE CARD)

DAYTIME PHONE \_\_\_\_\_

Litigation Lawyers,  
Professional Association  
2881 East Oakland Park Blvd., Suite 434  
Ft. Lauderdale, FL 33306

**LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harblison v. Patriots Bank

September 23, 2021

File # 3062.1

Invoice # 24500

## Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
8/17/2021	SBR Conferred with Rae Mosier (three times) (.58) Reviewed letter to Chris & Gina Harblison from Keith Brook, Esquire (attorney for Patriots Bank) (.08) (.58 NO CHARGE)	0.08 480.00/hr	38.40
8/18/2021	SBR Call to Rae Mosier (.08)	0.08 480.00/hr	NO CHARGE
8/19/2021	SBR Conferred with Rae Mosier (.08) Reviewed petition, reconsideration order and motion for leave to amend order (1.25) (.08 NO CHARGE)	1.25 480.00/hr	600.00
8/20/2021	SBR Conferred with Rae Mosier (several times) (.75) Call to Rae Mosier (.08)	0.83 480.00/hr	NO CHARGE
8/22/2021	SBR Call to Rae Mosier (.08) Reviewed recover letter to "Donny" (plant manager) (.08) (.08 NO CHARGE)	0.08 480.00/hr	38.40
8/23/2021	SBR Conferred with Rae Mosier (.58)	0.58 480.00/hr	NO CHARGE
8/24/2021	SBR Conferred with Rae Mosier, Chris Harblison and Gina Harblison (1.75) Conferred with Rae Mosier (.08) (.08 NO CHARGE)	1.75 480.00/hr	840.00
8/25/2021	SBR Conferred with Rae Mosier (three times) (.50)	0.50 480.00/hr	NO CHARGE
8/27/2021	SBR Conferred with Rae Mosier (.08) Prepared motion to vacate appointment of a receiver (3.75) Call to Rae Mosier (.08) Conferred with Rae Mosier (twice) (.17) Conferred with Rae Mosier, Chris Harblison and Gina Harblison (.50) Reviewed affidavits of Brad Krantz and Cameron Cooper (.17) Conferred with Rae Mosier and researched case law; Conferred with Chris	6.33 480.00/hr	3,038.40

(954) 356-0496



Harblson v. Patriots Bank

Invoice # 24500

		<u>Hrs/Rate</u>	<u>Amount</u>
	Harblson, Gina Harblson and Rae Mosler (1.58) (.25 NO CHARGE)		
8/28/2021	SBR Conferred with Rae Mosler (.08) Prepared motion to vacate appointment of a receiver and researched case law (11.00) Conferred with Chris Harblson (.25) Conference call with Mike Silvey, Rae Mosler, Gina Harblson and Spenser Desai (1.17) Conferred with Rae Mosler (twice) (.25) (.33 NO CHARGE)	12.00 480.00/hr	5,760.00
8/29/2021	SBR Conferred with Rae Mosler (.25) Researched case law and prepared motion to vacate receiver appointment (6.50) Prepared email to Gina Harblson (.08) Conferred with Rae Mosler (.42) Reviewed email from Gina and Chris Harblson; Prepared and updated motion to vacate; Researched case law (4.17) (.67 NO CHARGE)	10.75 480.00/hr	5,160.00
8/30/2021	SBR Researched case law and prepared motion to vacate appointment of a receiver (4.68) Conferred with Rae Mosler (twice) (.25) Reviewed materials from Gina Harblson (1.42)	6.25 480.00/hr	3,000.00
8/31/2021	SBR Conferred with Rae Mosler (twice) (.33) Researched case law (.42) Conferred with Rae Mosler (.08) Conferred with Gina and Chris Harblson (.58) Prepared motion to vacate appointment (2.75) (.33 NO CHARGE)	3.83 480.00/hr	1,838.40

**For professional services rendered****44.31****\$20,313.60**

## Additional Charges :

	<u>Qty/Price</u>	
8/30/2021 Scans	9 0.20	1.80
Photocopies	85 0.20	17.00
8/31/2021 Photocopies	11 0.20	2.20
Scans	77 0.20	15.40

**Total costs****\$36.40****For professional services rendered****44.31****\$20,350.00**

Harblson v. Patriots Bank  
Invoice # 24500

---

	<u>Amount</u>
Total amount of this bill	<u>\$20,350.00</u>
Balance due	<u>\$20,350.00</u>

Timekeeper Summary			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen Rakusin	42.32	480.00	\$20,313.60



**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

September 23, 2021

[gina@harbisonlumber.com](mailto:gina@harbisonlumber.com)

Gina Harbison

RE : HARBISON V. PATRIOTS BANK

OUR FILE NO. : 3062.1

Dear Ms. Harbison:

Enclosed please find my bill for services rendered in the above styled case for the period of September 1, 2021 through September 15, 2021.

The total amount due for fees is \$31,718.40. The total amount due for costs this billing period is \$0.00. The total amount due for fees and costs this billing period is \$31,718.40. The total amount now due is \$0.00.

This amount was deducted from your retainer. Your prompt payment of these items has been greatly appreciated.

As we discussed today, I have performed an additional \$25,036.80 for services between September 16 and September 22, 2021. Please provide an additional retainer replenishment of \$75,000.00. Again, it is a pleasure working with you.

Sincerely,



Stephen Rakusin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

Credit Card # \_\_\_\_\_ Exp. Date / CVV Code: \_\_\_\_\_

SIGNATURE (AS IT APPEARS ON THE CARD)

PRINT NAME (AS IT APPEARS ON THE CARD)

DAYTIME PHONE \_\_\_\_\_

Remit payment to:

Litigation Lawyers,  
Professional Association  
2881 East Oakland Park Blvd., Suite 434  
Ft. Lauderdale, FL 33306

**LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harbison v. Patriots Bank

September 23, 2021

File # 3082.1

Invoice # 24501

## Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
9/1/2021	SBR Researched case law and prepared motion to vacate (6.08) Conferred with Rae Mosier (.17) Conferred with Rae Mosier and researched case law (.92) (.33 NO CHARGE)	6.83 480.00/hr	3,278.40
9/2/2021	SBR Researched case law; Prepared motion to dismiss and motion to abate or stay (10.08) Conferred with Gina Harbison and conferred with Rae Mosier (several times) (.50) (.33 NO CHARGE)	10.25 480.00/hr	4,920.00
9/3/2021	SBR Conferred with Rae Mosier (several times) (.08) Prepared motion to dismiss (federal guarantee); Researched case law (2.25) Call to Spencer Desai (.08) Reviewed 2 hearing notices and exhibits to motion to compel; Reviewed email from Spencer Desai; Conferred with Spencer Desai and Rae Mosier (several times) Call to Nick Zluticky (1.33) (.08 NO CHARGE)	3.50 480.00/hr	1,680.00
9/4/2021	SBR Call to Rae Mosier (.08) Conferred with Gina and Chris Harbison (.08) Conferred with Rae Mosier (.25) Reviewed email from Gina Harbison (.08) Prepared memo to file (.08) Reviewed declaration "affidavit" of receiver (Brent King) (.33)	0.92 480.00/hr	441.60
9/5/2021	SBR Conferred with Gina Harbison (.92) Conferred with Rae Mosier and Chris Harbison (.25) Conferred with Rae Mosier (.42) Conferred with Chris and Gina Harbison (.17) (.42 NO CHARGE)	1.33 480.00/hr	638.40
9/6/2021	SBR Conferred with Rae Mosier (.33) Researched case law and conferred with Rae Mosier (.75)	1.08 480.00/hr	518.40
9/7/2021	SBR Researched case law and prepared motion to vacate (4.25) Conferred with Rae Mosier (.33) Call to Spencer Desai (.08) Conferred with Spencer Desai (.08)	6.08 480.00/hr	2,918.40

(954) 356-0496

Harbison v. Patriots Bank

Invoice # 24501

		<u>Hrs/Rate</u>	<u>Amount</u>
	Conferred with Mike Silvey (.17) Prepared email to Mike Silvey (.08) Conferred with Rae Mosler; Conferred with Chris Redmond, Nick Zluticky, Spencer Desai and Rae Mosler (.75) Conferred with Rae Mosler (.17) Conferred with Rae Mosler and Spencer Desai (.50) (.33 NO CHARGE)		
9/8/2021 SBR	Researched case law; Finalized motion to vacate (1.25) Conferred with Rae Mosler (.25) Conferred with Rae Mosler (.17) Conferred with Gina Harbison and Chris Harbison (.75) Conferred with Rae Mosler; Prepared 2 emails to Mike Silvey (.08) Conferred with Mike Silvey (.08) Prepared motion to compel and demand for return (Potosi Charcoal) (2.33)	4.92 480.00/hr	2,361.60
9/9/2021 SBR	Reviewed tax returns (.17) Conferred with Gina Harbison and Chris Harbison (.25) Conferred with Rae Mosler (.17) Prepared materials for Request to Produce (.33) Conferred with Rae Mosler (.17) Conferred with Mike Silvey and Rae Mosler (.42) Conferred with Spencer Desai; Conferred with Chris Harbison (twice) Prepared emails to Nick Zluticky, Esquire and Chris Redmond (1.17) Prepared memos to file; Conferred with Rae Mosler (.33) Conferred with Gina and Chris Harbison (.17) Reviewed 3/21/21 financial statement (all entities and Chris Harbison); Prepared memo to file (.50) (.50 NO CHARGE)	3.50 480.00/hr	1,680.00
9/10/2021 SBR	Conferred with Rae Mosler (.08) Conferred with Rae Mosler (.33) Reviewed CRAZ Investments, LLC Report and records and prepared report and prepared letter for counsel (2.17) Conferred with Spencer Desai (.08) Conferred with Rae Mosler (.33) Conferred with Rae Mosler (.25) Conferred with Gina Harbison (.17) (.75 NO CHARGE)	2.67 480.00/hr	1,281.60
9/11/2021 SBR	Conferred with Gina and Chris Harbison (.83) Call to Rae Mosler (.08) Reviewed Michael Pappas Notice of Appearance in docket (.08)	1.00 480.00/hr	480.00
9/12/2021 SBR	Call to Chris and Gina Harbison (.08) Conferred with Rae Mosler (several times) (.33) Reviewed Jonesburg Sawmill Reporting, records, general ledgers, journal records and prepared report (3.50) (.33 NO CHARGE)	3.58 480.00/hr	1,718.40
9/13/2021 SBR	Conferred with Rae Mosler (.17) Calls to Spencer Desai, Mike Silvey, Chris and Gina Harbison (.25) Reviewed 2 notices of withdrawal of deposition notices (.17) Prepared motion for protective order in Washington County (1.33) Call to Spencer Desai (.08) Conferred with Spencer Desai (.08) Call to Rae Mosler; Conferred with Gina	2.00 480.00/hr	960.00

Harblson v. Patriots Bank

Invoice # 24501

		<u>Hrs/Rate</u>	<u>Amount</u>
	Harblson (.17 NO CHARGE)		
9/14/2021	SBR Reviewed Gina Harblson email (.08) Prepared receiver reports and records from Gina Harblson complators (8.00) Prepared email to Rae Mosler with attachments; Reviewed email from Nick Zluticky (.08) Conferred with Rae Mosler (.58) Conferred with Gina Harblson (.17) Conferred with Rae Mosler (.50) (.83 NO CHARGE)	8.75 480.00/hr	4,200.00
9/15/2021	SBR Prepared drafts for reports to receiver (8.83) Reviewed bank appraisal information (for charcoal plant) and checklist (.08) Conferred with Nick Zluticky (.33) Conferred with Gina Harblson (.42)	9.67 480.00/hr	4,641.60
	For professional services rendered	66.08	\$31,718.40
	For professional services rendered	66.08	\$31,718.40
	Previous balance		\$20,350.00
	Balance due		\$52,068.40

Timekeeper Summary		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Name				
Stephen Rakusin		66.08	480.00	\$31,718.40

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

October 4, 2021

gina@harbisonlumber.com  
Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:

Enclosed please find my bill for services rendered in the above styled case for the period of September 16, 2021 through September 30, 2021.

The total amount due for fees is \$58,876.80. The total amount due for costs this billing period is \$1,553.15. The total amount due for fees and costs this billing period is \$60,429.95.

**The total amount now due is \$0.00.**

This amount was deducted from your retainer. Your prompt payment of these items has been greatly appreciated.

Sincerely,



Stephen Rakusan

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

Credit Card # \_\_\_\_\_ Exp. Date / CVV Code: \_\_\_\_\_

SIGNATURE \_\_\_\_\_ (AS IT APPEARS ON THE CARD)

PRINT NAME \_\_\_\_\_ (AS IT APPEARS ON THE CARD)

DAYTIME PHONE \_\_\_\_\_

**Remit payment to:**

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Professional Association  
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Ft. Lauderdale, FL 33306

## LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harbison v. Patriots Bank

October 04, 2021

File # 3062.1

Invoice # 24508

## Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
9/16/2021	SBR Conferred with Gina and Chris Harbison (.08) Conferred with Mike Silvey (twice) (.17) Prepared reports for receiver (6.05) Conferred with Gina Harbison (several times); Conferred with Rae Mosler (several times) (.83) Conferred with Nick Zluticky, Esquire (.17) Prepared letter to Nick Zluticky and Chris Redmond (.17) Conferred with Spencer Desal (.17) Conferred with Rae Mosler (.33) (.50 NO CHARGE)	7.42 480.00/hr	3,561.60
9/17/2021	SBR Traveled to Washington County; Met with Chris and Gina Harbison; Attended hearing; Met with Mike Silvey and Spencer Desal; Conferred with Rae Mosler; Prepared various motions and draft of answer; Returned to Ft. Lauderdale (16.58)	16.58 480.00/hr	7,958.40
9/18/2021	SBR Conferred with Gina Harbison (.33) Reviewed Spencer Desal email (.08) Reviewed amended complaint in federal county case (.76) Conferred with Rae Mosler (.17) (.17 NO CHARGE)	1.17 480.00/hr	561.60
9/20/2021	SBR Prepared and drafted various motions and prepared notice of filing requisite lists of creditors and assets; Drafted motion to compel turnover of Potosi Charcoal assets; Motion to approve sale; CHAB motion for limited receivership; Motion for Protective Order (5.17) Conferred with Rae Mosler (twice) (.50) Conferred with Gina Harbison (.42) (.50 NO CHARGE)	5.58 480.00/hr	2,678.40
9/21/2021	SBR Researched case law and prepared motion to approve sale; Prepared motion to dismiss (9.33) Conferred with Mike Silvey (.08) Conferred with Chris Harbison (.08) Reviewed Rae Mosler email (.33)	9.83 480.00/hr	4,718.40

(954) 356-0496

Harblson v. Patriots Bank

Invoice # 24508

		<u>Hrs/Rate</u>	<u>Amount</u>
9/22/2021	SBR Prepared motion for protective order and researched Missouri case law (7.58) Conferred with Spencer Desai (.25) Conferred with Rae Mosler (.33) Call to and email to Chris Redmond (.08) Conferred with Chris Harblson (.08) Prepared answer and affirmative defenses (3.58) (.33 NO CHARGE)	11.58 480.00/hr	5,568.40
9/23/2021	SBR Conferred with Chris Redmond, Esquire and Rae Mosler (.25) Conferred with Rae Mosler, Gina and Chris Harblson (.33) Conferred with Rae Mosler (.08) Conferred with Chris Harblson (.08) Conferred with Chris Redmond and Nick Zluticky (.50) Conferred with Rae Mosler (.17) Conferred with Mike Silvey (.17) Conferred with Chris Harblson (.17) Prepared Answer and Affirmative Defenses and Counterclaim and revised Motion to Dismiss in federal case (9.33) Conferred with Rae Mosler (.17) (.50 NO CHARGE)	10.50 480.00/hr	5,040.00
9/24/2021	SBR Conferred with Spencer Desai (.25) Conferred with Mike Silvey (.17) Conferred with Rae Mosler (.33) Prepared Answer and Affirmative Defenses and Counterclaim; Researched case law (5.33) (.33 NO CHARGE)	5.75 480.00/hr	2,760.00
9/25/2021	SBR Reviewed Bank emails with Chris and Gina Harblson; Researched case law; Prepared Counterclaim; Prepared additional Affirmative Defenses (9.83) Conferred with Gina Harblson on pleadings and loan (2.08) Conferred with Rae Mosler (.17) (.17 NO CHARGE)	11.92 480.00/hr	5,721.60
9/26/2021	SBR Prepared Answer, Affirmative Defenses and Counterclaim; Researched case law (11.50) Conferred with Gina Harblson (.33)	11.83 480.00/hr	5,678.40
9/27/2021	SBR Conferred with Rae Mosler (.50) Researched case law; Prepared Answer and Affirmative Defenses and Counterclaim (12.67) Conferred with Mike Silvey (.25) Conferred with Gina Harblson; Conferred with Spencer Desai; Conferred with Mike Silvey (1.08) (.50 NO CHARGE)	14.00 480.00/hr	6,720.00
9/28/2021	SBR Prepared Answer, Affirmative Defenses and Counterclaim (6.50) Conferred with Mike Silvey (twice); Call to Spencer Desai; Conferred with Gina Harblson; Conferred with Chris Harblson; Call to Nick Zluticky (and email); Call to Chris Redmond (1.42) Conferred with Rae Mosler (.67) (.67 NO CHARGE)	7.92 480.00/hr	3,801.60

Harblison v. Patriots Bank

Invoice # 24508

		<u>Hrs/Rate</u>	<u>Amount</u>
9/29/2021	SBR Prepared Answer, Affirmative Defenses and Counterclaim (4.50) Conferred with Gina Harblison (.50) Reviewed Spencer Desal email to Bank Attorney (Clayton Kuhn) (.08)	5.08 480.00/hr	2,438.40
9/30/2021	SBR Reviewed Gina Harblison email (.08) Prepared consensus revisions to 4 Answers, Affirmative Defenses and Counterclaims (3.92) (.50 NO CHARGE)	3.50 480.00/hr	1,680.00

For professional services rendered

122.66 \$58,876.80

Additional Charges :

	<u>Qty/Price</u>	
9/17/2021 Round Trip Flight to MO	1 583.95	583.95
Scans	1 243.80	243.80
9/23/2021 Scans	1,295 0.20	259.00
Photocopies	2,332 0.20	466.40

Total costs

\$1,553.15

For professional services rendered

122.66 \$60,429.95

Total amount of this bill

\$60,429.95

Previous balance

\$52,068.40

9/23/2021 Payment - Thank You

(\$20,350.00)

9/23/2021 Payment - Thank You

(\$31,718.40)

Total payments and adjustments

(\$52,068.40)

Balance due

\$60,429.95

## Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen Rakusin	122.66	480.00	\$58,876.80



**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

October 21, 2021

gina@harbisonlumber.com  
Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:

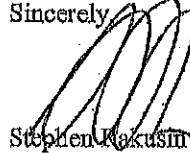
Enclosed please find my bill for services rendered in the above styled case for the period of October 1, 2021 through October 15, 2021.

The total amount due for fees is \$26,563.20. The total amount due for costs this billing period is \$2,116.51. The total amount due for fees and costs this billing period is **\$28,679.71**.

**The total amount now due is \$0.00.**

This amount was deducted from your retainer. Your prompt payment of these items has been greatly appreciated.

Sincerely,



Stephen Rakusin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

Credit Card # \_\_\_\_\_ Exp. Date / CVV Code: \_\_\_\_\_

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SIGNATURE (AS IT APPEARS ON THE CARD)

PRINT NAME (AS IT APPEARS ON THE CARD)

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Ft. Lauderdale, FL 33306

**LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harblison v. Patriots Bank

October 21, 2021

File # 3062.1

Invoice # 24509

## Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
10/1/2021	SBR Reviewed Federal Motion for Extension of Time filed by Spencer Desai (.08) Conferred with Rae Mosier (.17) Prepared email to Nick Zluticky and Chris Redmond (.25) (.08) (.17 NO CHARGE)	0.42 480.00/hr	201.60
10/2/2021	SBR Reviewed E.D.M. Certificate of Patriots Bank non-compliance (.08) Reviewed court docket order (.08) Reviewed subpoena for Chris Harblison and Gina Harblison (.17)	0.33 480.00/hr	158.40
10/3/2021	SBR Conferred with Chris Harblison (.25)	0.25 480.00/hr	120.00
10/4/2021	SBR Conferred with Cash Gill (.25) Prepared materials for Cash Gill (.50) Conferred with Gina Harblison (.25) Conferred with Rae Mosier (.17) Conferred with Spencer Desai (.17) (.17 NO CHARGE)	1.17 480.00/hr	561.60
10/5/2021	SBR Prepared Request to Produce; Prepared and (b) (6) list of deposition topics (2.50) Conferred with Rae Mosier (.17) Conference call with Spencer Desai and Rae Mosier (1.42) Conferred with Rae Mosier (twice) (.33) (.50 NO CHARGE)	3.92 480.00/hr	1,881.60
10/6/2021	SBR Prepared list of potential witnesses (.08) Prepared deposition notices and schedules for Patriots Bank and Receiver; Prepared Request to Produce for Receiver (1.83) Conferred with Chris Harblison (.33) Conferred with Mike Silvey (.17) Conferred with Cash Gill (.17) Conferred with Chris and Gina Harblison (.17) Conferred with Rae Mosier (.67) (.67 NO CHARGE)	2.75 480.00/hr	1,320.00

(954) 356-0496

Harbison v. Patriots Bank

Invoice # 24509

		<u>Hrs/Rate</u>	<u>Amount</u>
10/7/2021	SBR Reviewed Cash Gill email (.08) Conferred with Rae Mosier (.17) Reviewed emails (.08) Reviewed personal emails (and texts) with the Coopers (.17) Reviewed Cooper remodel emails (.17)	0.67 480.00/hr	321.60
10/8/2021	SBR Conferred with Gina Harbison and Chris Harbison (.25)	0.25 480.00/hr	120.00
10/10/2021	SBR Conferred with Gina Harbison (.17) Conferred with Chris Harbison (.08) Conferred with Rae Mosier (.17) Prepared packet for client meeting (.17) Conferred with and email to Gina Harbison (.08) Prepared Motion for Protective Order (.92) Conferred with Gina and Chris Harbison (.33) Conferred with Rae Mosier; Conferred with Gina Harbison; Conferred with Spencer Desai (twice); Conferred with Adam Peipke (1.00) (.17 NO CHARGE)	2.58 480.00/hr	1,238.40
10/11/2021	SBR Conferred with Rae Mosier (.08)	0.08 480.00/hr	NO CHARGE
10/12/2021	SBR Conferred with Rae Mosier (.08) Conferred with Chris Harbison (.08) Call to Rae Mosier; Conferred with Rae Mosier (.17) Met with Gina and Chris Harbison (deposition preparation); Conferred with Rae Mosier (several times); Conferred with Spencer Desai (twice); Conference call with Spencer Desai and Chris Redmond; Conferred with Nick Zluticky; Conferred with Cash Gill (5.67) Reviewed Kingsford Charcoal; Conferred with research reports; Conferred with Chris Harbison; Conferred with Spencer Desai; Conferred with Rae Mosier (.58)	6.25 480.00/hr	3,000.00
10/13/2021	SBR Prepared materials for meeting; Conferred with Rae Mosier; Met with Chris Harbison and Gina Harbison; Conferred with Spencer Desai; Prepared emails to Chris Redmond; Conferred with Cash Gill (7.83) Prepared deposition exhibits (5.75)	13.58 480.00/hr	6,518.40
10/14/2021	SBR Prepared for upcoming deposition; Organized exhibits (5.00) Call to Leon and Adam Peipke; Conferred with Dewayne Konick (.08) Conferred with Adam Peipke (.08) Conferred with Gina Harbison; Conferred with Mike Silvey (twice); Call to Chris Harbison and traveled to Missouri (5.50)	10.67 480.00/hr	5,121.60
10/15/2021	SBR Reviewed Receiver's Contempt Motions; Met with Chris Harbison; Attended scheduling hearing (telephonic); Conferred with Mike Silvey; Conferred with Rae Mosier; Met with Cash Gill and inspected properties at the Jonesburg Sawmill, the CRAZ Charcoal Manufacturing Plant and the Black River Hotel; Reviewed Second Motion of Appointment of Receiver; Conferred with Gina Harbison; Reviewed	12.50 480.00/hr	6,000.00

Harblson v. Patriots Bank

Invoice # 24509

	<u>Hrs/Rate</u>	<u>Amount</u>
records; Met with Gina Harblson; Traveled to Farmington; Prepared transmittal letter for appraiser and selected documents to be sent to him; Prepared responses to Motion to Limit CHAB Receivership and Motion to Turnover Potosi Charcoal assets (12.50)		
For professional services rendered	55.42	\$26,563.20
Additional Charges :		
	<u>Qty/Price</u>	
10/14/2021 Diner - IMO's	1 25.45	25.45
Taxi (Show Me Taxi)	1 50.00	50.00
Mariott - St. Louis	1 186.74	186.74
SouthWest Airline Ticket (St. Louis)	1 370.98	370.98
10/15/2021 Hampton Inn - Farmington	1 410.33	410.33
Dinner - 12 West	1 29.33	29.33
Deposition Transcript for First Day of Deposition 10/18/21 Patriots Bank v. Black River Motel, LLC Witness: Regina Harblson - Corporate Representative of CRAZ Investments, LLC	1 1,043.68	1,043.68
Total costs		<u>\$2,116.51</u>
For professional services rendered	55.42	\$28,679.71
Total amount of this bill		<u>\$28,679.71</u>
Previous balance		<u>\$60,429.95</u>
Balance due		<u>\$89,109.66</u>

Harblson v. Patriots Bank  
Invoice # 24509

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Timekeeper Summary			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen Rakusin	55.34	480.00	\$26,563.20

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

November 2, 2021

gina@harbisonlumber.com

Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:

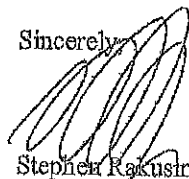
Enclosed please find my bill for services rendered in the above styled case for the period of October 16, 2021 through October 31, 2021.

The total amount due for fees is \$100,973.40. The total amount due for costs this billing period is \$7,546.81. The total amount due for fees and costs this billing period is \$108,520.21. Payments were received in the amount of \$83,821.94.

**The total amount now due is \$24,579.42.**

Payment is now due. Your prompt payment of these items will be greatly appreciated.

Sincerely,



Stephen Rakusin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

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SIGNATURE \_\_\_\_\_ (AS IT APPEARS ON THE CARD)

PRINT NAME \_\_\_\_\_ (AS IT APPEARS ON THE CARD)

DAYTIME PHONE \_\_\_\_\_

Remit payment to:

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2881 East Oakland Park Blvd., Suite 434  
Ft. Lauderdale, FL 33306

## LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harblson v. Patriots Bank

November 02, 2021

File # 3062.1

Invoice # 24510

## Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
10/16/2021	SBR Prepared opposition to second motion for appointment of a Receiver; Prepared various motions; Met with Chris and Gina Harblson; Several phone calls with Rae Mosler; Prepared for upcoming depositions; Conferred with Chris Redmond (.42) Returned to Farmington (14.00) (.92 NO CHARGE)	13.50 480.00/hr	6,480.00
10/17/2021	SBR Prepared response to second receivership motion for appointment of a receiver; Met with Chris and Gina Harblson; Prepared motions to turnover Potosi Charcoal; Conferred with Chris Redmond; Prepared motion to shorten time, motion for protective order, motion to restrict and convert CHAB receivership; Prepared for upcoming depositions; Traveled to St. Louis; Met with Dewayne Koneck; Conferred with Rae Mosler and clients (several times) (10.58)	10.58 480.00/hr	5,078.40
10/18/2021	SBR Prepared response to second motion; Prepared for and attended deposition of Corporate Representative of CRAZ Investments (Gina Harblson); Met with Gina Harblson and Chris Harblson; Conferred with Mike Silvey; Conferred with Cash Gili; Conferred with Rae Mosler (.75 NO CHARGE)	14.25 480.00/hr	6,840.00
10/19/2021	SBR Prepared response to second motion; Attended depositions of Corporate Representative of CRAZ Investments; Met with Gina Harblson; Prepared for and attended deposition of CHAB Corporate Representative; Traveled to Potosi; Prepared for upcoming hearings; Conferred with Rae Mosler; Conferred with Spencer Desal (16.17) (.33 NO CHARGE)	15.83 480.00/hr	7,598.40

(954) 356-0496

Harblson v. Patriots Bank

Invoice # 24510

		<u>Hrs/Rate</u>	<u>Amount</u>
10/20/2021	SBR Prepared for and attended motion hearing; Met with Spencer Desai and Mike Silvey; Attended deposition of CHAB Development Corporate Representative; Attended deposition of Black River Motel Corporate Representative; Conferred with Rae Mosler; Conferred with Gina Harblson (16.83) (.50 NO CHARGE)	16.33 480.00/hr	7,838.40
10/21/2021	SBR Organized exhibits and records from Missouri hearing (2.25) Conferred with Rae Mosler (.25) Conferred with Spencer Desai and Conferred with Gina Harblson (1.17) Conferred with Rae Mosler (.08) Conference call with Nick Zluticky, Chris Redmond, Spencer Desai and Rae Mosler (.50) Conferred with Rae Mosler (.33) Prepared objection and several emails to Nick Zluticky; Prepared email to Spencer Desai and Rae Mosler; Prepared pleading responses; Conferred with Gina Harblson; Conferred with Mike Silvey (9.17)	12.33 480.00/hr	5,918.40
10/22/2021	SBR Conferred with Gina Harblson; Conferred with Spencer Desai; Prepared objection to second motion for appointment of receiver; Prepared answer, affirmative defenses and counterclaim; Prepared letter to accountant and affidavit materials; Prepared response to contempt motions; Prepared for upcoming deposition of Patriots Bank and Corporate Representative; Prepared witness questions; Prepared witness packets; Prepared responses to four contempt motions and second motion for appointment of a receiver	13.75 480.00/hr	6,600.00
10/23/2021	SBR Reviewed correspondence on litigation; Prepared draft of answers, affirmative defenses and counterclaims; Call and email to Spencer Desai; Conferred with Spencer Desai; Prepared objections and responses to contempt motion (CRAZ); Prepared witness questions; Prepared for upcoming depositions (8.58) Conferred with Rae Mosler (.08) (.08 NO CHARGE)	8.58 480.00/hr	4,118.40
10/24/2021	SBR Prepared objection and response to contempt motion (CHAB, Jonesburg and CRAZ); Prepared witness questions; Prepared for upcoming depositions; Prepared exhibits for deposition and trial; Conferred with Gina Harblson; Conferred with Chris Harblson; Conferred with Rae Mosler (.17) (.33 NO CHARGE)	11.92 480.00/hr	5,721.60
10/25/2021	SBR Prepared for upcoming depositions; Prepared motion to dismiss; Conferred with Marty Cass; Prepared email to Marty Cass (CPA with BDO) (.08) Reviewed materials from Gina Harblson; Conferred with Rae Mosler; Traveled to Kansas City; Met with Donnie Marler to set	11.92 480.00/hr	5,721.60



Harblson v. Patriots Bank

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Invoice # 24510

		<u>Hrs/Rate</u>	<u>Amount</u>
	up exhibits (13.25) (1.33 NO CHARGE)		
10/25/2021 JV	Reviewed / analyzed October 18, 2021 deposition of Reglna Harblson in preparation for draft of deposition summary	2.50 180.00/hr	450.00
10/26/2021 SBR	Prepared for and attended (Justin Hobbs) deposition of Patriots Bank Corporate Representative in Kansas City; Conferred with Gina Harblson and Chris Harblson; Conferred with Mike Silvey; Conferred with Cash Gill; Conferred with Rae Mosler; Conferred with Spencer Desai (.33 NO CHARGE)	15.17 480.00/hr	7,281.60
JV	Prepared summary of deposition testimony of Gina Harblson taken October 18, 2021	7.25 180.00/hr	1,305.00
10/27/2021 SBR	Prepared for and attended deposition of Brent King; Conferred with Chris Harblson; Prepared responses to contempt motions (CHAB and CRAZ); Prepared objections to Rae application of receiver; Conferred with Gina Harblson; Call to accountant Michael Edelschick (BDO); Call to Spencer Desai; Call to Mike Silvey; Returned to Ft. Lauderdale (2.00 NO CHARGE)	15.33 480.00/hr	7,358.40
JV	Prepared draft summary of testimony of Gina Harblson taken October 18, 2021	8.75 180.00/hr	1,575.00
10/28/2021 SBR	Prepared responses and objections to 4 contempt motions; Prepared declarations; Conferred with Mike Silvey; Conferred with Gina Harblson and Spencer Desai (2.42) Conferred with Rae Mosler (.08) Conferred with Rae Mosler (.42) (.75 NO CHARGE)	12.17 480.00/hr	5,841.60
JV	Prepared and completed summary of testimony of Gina Harblson taken October 18, 2021	4.00 180.00/hr	720.00
10/29/2021 SBR	Prepared responses and objection to contempt motions; Prepared response to second motion for appointment; Conferred with Gina Harblson; Conferred with Spencer Desai; Conferred with Rae Mosler (.33) Conferred with Chris Harblson; Conferred with Cash Gill; Prepared draft declaration (Gina Harblson) (5.58) Prepared motion to dismiss and motion to stay and abate; Researched case law in federal case (4.25) (.75 NO CHARGE)	9.42 480.00/hr	4,521.60
JV	Reviewed and analyzed deposition transcript of Corporate Representative for CHAB Development, LLC	0.75 180.00/hr	135.00

Harblson v. Patriots Bank  
 Invoice # 24510

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/29/2021	JV Prepared draft summary of testimony of Corporate Representative of CHAB Development, LLC	3.25 180.00/hr	585.00
10/30/2021	SBR Prepared motions to dismiss; Prepared trial questions; Prepared declaration for Gina Harblson; Conferred with Chris Harblson and Gina Harblson; Conferred with Rae Mosler; Call to Spencer Desai; Conferred with Spencer Desai (9.50) (.33 NO CHARGE)	9.17 480.00/hr	4,401.60
	JV Prepared and continued drafting summary of deposition testimony of Corporate Representative of CHAB Development, LLC	6.25 180.00/hr	1,125.00
10/31/2021	SBR Prepared declaration of Gina Harblson; Prepared witness questions; Conferred with Gina Harblson; Conferred with Rae Mosler and Gina Harblson (8.17) (.33 NO CHARGE)	7.83 480.00/hr	3,758.40
For professional services rendered		230.83	\$100,973.40

Additional Charges :

		<u>Qty/Price</u>	
10/16/2021	Office Depot (Farmington) - Office Max (Boxes/Supplies/Toner)	1 351.02	351.02
10/18/2021	Marriott Hotel and Resorts	1 186.74	186.74
10/19/2021	Cheesecake Factory	1 49.58	49.58
	Hampton Inn & Suites	1 410.33	410.33
10/20/2021	Deposition on 10-18-21	1 1,043.68	1,043.68
10/21/2021	Massas 5 Restaurant	1 35.86	35.86
	Spirit Airlines	1 250.39	250.39
10/25/2021	Hotel - Marriott	1 641.14	641.14
	Spirit Airlines	1 221.77	221.77

Harbison v. Patriots Bank  
 Invoice # 24510

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	<u>Qty/Price</u>	<u>Amount</u>
10/26/2021 Deposition on 10-20-21 Corporate Representative of Black River Motel, LLC Pohlman Court Reporting	1 330.25	330.25
Cross Court Reporting - Advanced Payment (Waiting for remainder bill)	1 500.00	500.00
Deposition on 10-19-21 Corporate Representative of CRAZ Investments, LLC Pohlman Court Reporting	1 560.29	560.29
Deposition on 10-20-21 Corporate Representative of CHAB Development, LLC Pohlman Court Reporting	1 586.46	586.46
Deposition on 10-19-21 Corporate Representative of CHAB Development, LLC Pohlman Court Reporting	1 678.37	678.37
10/27/2021 Dinner in Dallas	1 13.00	13.00
Pappasito's Cantina in Dallas	1 28.30	28.30
American Airlines	1 540.00	540.00
10/31/2021 Southwest Airlines - Flight from 10/15/21	1 258.98	258.98
Scans	754 0.20	150.80
Photocopies	2,955 0.20	591.00
<b>Total costs</b>		<b>\$7,427.96</b>
<b>For professional services rendered</b>	<b>230.83</b>	<b>\$108,401.36</b>
<b>Total amount of this bill</b>		<b>\$108,401.36</b>
<b>Previous balance</b>		<b>\$89,109.66</b>
10/4/2021 Payment - Thank You		(\$60,429.95)
10/21/2021 Payment - Thank You		(\$28,679.71)
10/31/2021 Payment - Thank You		(\$83,821.94)
<b>Total payments and adjustments</b>		<b>(\$172,931.60)</b>

Harbison v. Patriots Bank  
Invoice # 24610

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Balance due

Amount\$24,579.42

## Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joan Vinik	32.75	180.00	\$5,895.00
Stephen Rakusin	198.08	480.00	\$95,078.40

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

November 17, 2021

gina@harbisonlumber.com  
Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:

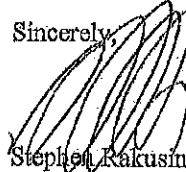
Enclosed please find my bill for services rendered in the above styled case for the period of November 1, 2021 through November 15, 2021.

The total amount due for fees is \$83,438.40. The total amount due for costs this billing period is \$7,141.17. The total amount due for fees and costs this billing period is **\$90,579.57**. Payments were received in the amount of \$75,000.00 (subject to the checks clearing).

**The total amount now due is \$39,958.99.**

Payment is now due. Your prompt payment of these items will be greatly appreciated.

Sincerely,



Stephen Rakusin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

Credit Card # \_\_\_\_\_ Exp. Date / CVV Code: \_\_\_\_\_

SIGNATURE \_\_\_\_\_ (AS IT APPEARS ON THE CARD)

PRINT NAME \_\_\_\_\_ (AS IT APPEARS ON THE CARD)

DAYTIME PHONE \_\_\_\_\_

Remit payment to:

Litigation Lawyers,  
Professional Association  
2881 East Oakland Park Blvd., Suite 434  
Ft. Lauderdale, FL 33306

**LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harbison v. Patriots Bank

November 17, 2021

File # 3062.1

Invoice # 24518

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
11/1/2021 SBR Prepared for accountant call (.25) Conferred with Rae Mosler and Phil Shechter (several times) (1.17) Conferred with Phil Shechter and Matt Druckman (.25) Prepared declaration materials (.50) Conferred with Cash Gill (.08) Reviewed emails from Court Reporter, Mike Silvey; Reviewed Krantz subpoena (.25) Reviewed emails (.25) Conferred with Gina Harbison (.58) Conferred with Cash Gill (.42) Prepared for upcoming trial (4.33) Conferred with Spencer Desai (.17) Conferred with Gina Harbison and Chris Harbison (.08) Conferred with Cash Gill (twice) (.42) Conferred with Chris Harbison (.17)	8.92 480.00/hr	4,281.60
11/2/2021 SBR Researched case law; Prepared motion to dismiss and motion to stay in federal court; Prepared exhibit list and witness list; Conferred with Rae Mosler (several times); Conferred with Cash Gill (several times); Conferred with Gina Harbison; Conferred with Mike Silvey (three times); Conferred with Spencer Desai; Prepared materials for trial; Conferred with Matt Druckman in Phil Shechter's office (15.42)	15.42 480.00/hr	7,401.60
11/3/2021 SBR Prepared motion to accept exhibit list and list out of time (1.83) Prepared exhibit list and exhibits; Prepared 4 answers, affirmative defenses and counterclaim; prepared letter to Court; Conferred with Gina Harbison and Chris Harbison; Conferred with Rae Mosler (several times); Conferred with Mike Silvey (12.33) (2.00 NO CHARGE)	10.33 480.00/hr	4,958.40
11/4/2021 SBR Prepared for upcoming trial; Traveled to Farmington, Missouri; Conferred with clients; Conferred with counsel (13.33)	13.33 480.00/hr	6,398.40
11/5/2021 SBR Prepared for upcoming trial; Attended telephone hearing; Conferred with various counsel (12.25)	12.25 480.00/hr	5,880.00

(954) 356-0496

Harblson v. Patriots Bank

Invoice # 24518

		<u>Hrs/Rate</u>	<u>Amount</u>
11/6/2021	SBR Prepared for upcoming trial; Met with clients; Conferred with various counsel (13.58)	13.58 480.00/hr	6,518.40
11/7/2021	SBR Prepared for upcoming trial; Met with client; Conferred with various counsel (16.75)	16.75 480.00/hr	8,040.00
11/8/2021	SBR Prepared for and attended trial; Prepared for second day of trial (14.58)	14.58 480.00/hr	6,998.40
11/9/2021	SBR Prepared for second day of trial; Conferred with client; Conferred with counsel; Conferred with expert witness (12.17)	12.17 480.00/hr	5,841.60
11/10/2021	SBR Prepared for second day of trial; Conferred with client; Conferred with counsel; Conferred with expert witness (14.25)	14.25 480.00/hr	6,840.00
11/11/2021	SBR Prepared for second day of trial; Traveled to St. Louis; Legal research at Washington University Law Library; Met with Rae Mosier; Returned to Farmington; Conferred with client; Conferred with counsel; Conferred with expert witness (15.75)	15.75 480.00/hr	7,560.00
11/12/2021	SBR Prepared for and attended trial in Potosi; Met with clients and Rae Mosier; Organized trial materials; Prepared materials for trial brief and memo of law (10.50)	10.50 480.00/hr	5,040.00
11/13/2021	SBR Prepared materials for trial brief; Travel to St. Louis and then Ft. Lauderdale (9.75)	9.75 480.00/hr	4,680.00
11/15/2021	SBR Prepared discovery response (.58) Call to Spencer Desal (.08) Conferred with Spencer Desal (.17) Conferred with Rae Mosier; Researched case law; Prepared trial brief (5.42) (.33 NO CHARGE)	6.25 480.00/hr	3,000.00

**For professional services rendered****173.83 \$83,438.40**

## Additional Charges :

	<u>Qty/Price</u>	
11/2/2021 Pohlman Court Reporting Patriots Bank v. Black River Motel, LLC Corporate Representative of Black River - Regina Harblson	1 91.50	91.50
Cross Reporting - Deposition of Corporate Representative of Patriots Bank - Justin Hobbs Corporate Representative of GlassRatner - Brent King October 26 & 27, 2021	1 1,612.20	1,612.20

Harbison v. Patriots Bank  
 Invoice # 24518

	<u>Qty/Price</u>	<u>Amount</u>
11/4/2021 Conference Room Rental with Tax	1 500.00	500.00
Alamo	1 511.55	511.55
Hampton Inn - Farmington	1 1,136.02	1,136.02
Box Shipping Fee	1 225.00	225.00
Southwest	1 509.96	509.96
11/5/2021 Food Charges - Farmington	1 266.54	266.54
11/10/2021 Pohlman Court Reporting on 10/29/21 Patriots Bank v. Black River Motel, LLC Witness: Regina Harbison	1 398.60	398.60
Expedited Transcript Copy of Phillip Shechter Transcript	1 1,100.20	1,100.20
11/11/2021 Parking at Washington University Law Library	1 4.00	4.00
11/13/2021 Southwest - Extra Baggage	1 75.00	75.00
11/14/2021 Scans	783 0.20	156.60
Photocopies	2,770 0.20	554.00
<b>Total costs</b>		<b>\$7,141.17</b>
<b>For professional services rendered</b>	<b>173.83</b>	<b>\$90,579.57</b>
<b>Total amount of this bill</b>		<b>\$90,579.57</b>
<b>Previous balance</b>		<b>\$24,579.42</b>
11/5/2021 Car Credit		(\$100.00)
11/12/2021 Car Tire Credit		(\$100.00)
<b>Total payments and adjustments</b>		<b>(\$200.00)</b>



Harblson v. Patriots Bank  
Invoice # 24518

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Balance due

Amount

\$114,958.99

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen Rakusin	173.83	480.00	\$83,438.40

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

December 2, 2021

gina@harbisonlumber.com  
Gina Harbison

RE : HARBISON V. PATRIOTS BANK

OUR FILE NO. : 3062.1

Dear Ms. Harbison:

Enclosed please find my bill for services rendered in the above styled case for the period of November 16, 2021 through November 30, 2021.

The total amount due for fees is \$50,153.40. The total amount due for costs this billing period is \$3,548.64. The total amount due for fees and costs this billing period is \$53,702.04. You had a previous balance in the amount of \$39,958.99.

The total amount now due is \$93,661.03.

Payment is now due. Your prompt payment of these items will be greatly appreciated.

Sincerely,



Stephen Rakusin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

Credit Card # \_\_\_\_\_ Exp. Date / CVV Code: \_\_\_\_\_

Remit payment to:

SIGNATURE (AS IT APPEARS ON THE CARD)

PRINT NAME (AS IT APPEARS ON THE CARD)

DAYTIME PHONE \_\_\_\_\_

Litigation Lawyers,  
Professional Association  
2881 East Oakland Park Blvd., Suite 434  
Ft. Lauderdale, FL 33306

**LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harblson v. Patriots Bank

December 02, 2021

File # 3062.1

Invoice # 24524

## Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
11/16/2021	SBR Prepared discovery responses and objections (3.25) Conferred with Chris Harblson (.08) Conferred with Mike Silvey (.17) Conferred with Rae Mosler (twice) (.50) Conferred with Gina Harblson (.17) (.60 NO CHARGE) (Nov. 14, 2021)	3.67 480.00/hr	1,761.60
	SBR Call to Mike Pappas (.08) Researched case law; Prepared trial brief for court (10.50) Conferred with Gina Harblson (.17) Conferred with Theresa Sapp (Legend Land) (.33) Call to Spencer Desai (.08) Conferred with Mike Silvey (.25) Conferred with Rae Mosler (.42) (.42 NO CHARGE)	11.33 480.00/hr	5,438.40
	JV Prepared deposition summary of deposition of Brent King (5.00) (4.00 NO CHARGE) (Nov. 8, 2021)	1.00 180.00/hr	180.00
	JV Organized exhibits in preparation for trial; Organized operative pleadings in preparation for trial (5.42) (4.00 NO CHARGE) (Nov. 12, 2021)	1.42 180.00/hr	255.60
	JV Prepared summary of deposition of Justin Hobbs (6.50) (5.00 NO CHARGE) (Nov. 6, 2021)	1.50 180.00/hr	270.00
	JV Prepared partial summary of deposition of Phillip Shechter (7.50) (5.00 NO CHARGE) (Nov. 11, 2021)	2.50 180.00/hr	450.00
	JV Prepared summary deposition of Corporate Representative of CHAB; Prepared summary of deposition of Corporate Representative of Black River Motel; Organized exhibits with bates numbers; Prepared	3.00 180.00/hr	540.00

(954) 356-0496

Harbison v. Patriots Bank

Invoice # 24624

		<u>Hrs/Rate</u>	<u>Amount</u>
	motion to dismiss amended petition (federal/state) (7.00) (4.00 NO CHARGE) (Nov. 2, 2021)		
11/16/2021 JV	Prepared and compiled exhibits in preparation for trial, prepared notice of filing exhibit list; Prepared response and objection to motion to approve payment (8.83) (5.83 NO CHARGE) (Nov. 3, 2021)	3.00 180.00/hr	540.00
JV	Prepared summary of deposition of Gina Harbison; Organized exhibits in sequence to various depositions and transmit same to client (8.42) (5.42 NO CHARGE) (Nov. 5, 2021)	3.00 180.00/hr	540.00
JV	Organized exhibits to numerous depositions; Prepared deposition summary of Corporate Representative of CHAB; Reviewed VOL II of Black River Corporate Representative; Prepared witness questions to Cash Gill & Phillip Shechter (7.33) (4.33 NO CHARGE) (Nov. 4, 2021)	3.00 180.00/hr	540.00
JV	Prepared excerpts to Justin Hobbs testimony for trial cross-exam; Prepared key transcript subjects for use at trial (7.00) (3.00 NO CHARGE) (Nov. 7, 2021)	4.00 180.00/hr	720.00
JV	Prepared summary for Declaration of Gina Harbison; Prepared testimony excerpts of Justin Hobbs (8.17) (4.17 NO CHARGE) (Nov. 9, 2021)	4.00 180.00/hr	720.00
JV	Prepared summary of deposition of Corporate Representative of CRAZ Investments; Prepared witness questions to appraiser and CPA for trial (8.58) (3.58 NO CHARGE) (Nov. 1, 2021)	5.00 180.00/hr	900.00
JV	Prepared Black River's responses to Patriots first Request for Production and Motion for Extension to Respond, Motion for Stay, and Motion for Extension to File Privilege Log; Compile and organize attorney notes from trial in preparation for Motion to Vacate (7.83) (2.00 NO CHARGE)	5.83 180.00/hr	1,049.40
11/17/2021 SBR	Researched case law; Prepared trial brief; Conferred with Rae Mosier (9.92) (.17 NO CHARGE)	9.75 480.00/hr	4,680.00

Harblson v. Patriots Bank  
 Invoice # 24524

		<u>Hrs/Rate</u>	<u>Amount</u>
11/18/2021	SBR	Researched case law; Prepared trial brief (11.08)	11.08 480.00/hr 5,318.40
	JV	Prepared CRAZ responses to Patriots First Request for Production, Jonesburg response to Patriots First Request for Production; Prepared Motion for Extension of Time, Motion for Stay and Motion for Extension of Time to File Privilege log (7.50) (3.50 NO CHARGE)	4.00 180.00/hr 720.00
11/19/2021	SBR	Researched case law; Prepared trial brief (9.25) Conferred with Gina Harblson and Chris Harblson (.17) Conferred with Rae Mosler (.67) (.67 NO CHARGE)	9.50 480.00/hr 4,560.00
	JV	Prepared responses to Patriots First Request for Production to Black River, CRAZ, Jonesburg and CHAB (7.00) (5.00 NO CHARGE)	2.00 180.00/hr 360.00
11/20/2021	SBR	Prepared and revised trial brief; Researched case law (7.50) Conferred with Gina Harblson (.17) Reviewed Mike Silvey email (.08)	7.75 480.00/hr 3,720.00
	JV	Prepared and continued revisions to Post Trial Motion to Vacate; Final preparation of summaries of Gill appraisals for 4 properties (7.00)	7.00 180.00/hr 1,260.00
11/21/2021	SBR	Reviewed Spencer Desai email (.17) Researched case law; Proposed and revised trial brief (7.25) Prepared email to Spencer Desai (.25)	7.67 480.00/hr 3,681.60
11/22/2021	SBR	Prepared brief revisions; Reviewed Spencer Desai email (10.08) Conferred with Gina Harblson; Conferred with Mike Silvey and Theresa Sapp (Legend Land); Conferred with Spencer Desai; Conferred with Rae Mosler; Prepared rebuttal brief materials; Conferred with Rae Mosler (.08) (.33 NO CHARGE)	10.75 480.00/hr 5,160.00
	JV	Prepared CHAB's response to Patriots First Request for Production Motion for Stay and Motion for Privilege Log; Prepared summary of Brent King deposition (7.50) (2.00 NO CHARGE)	5.50 180.00/hr 990.00
11/23/2021	SBR	Reviewed 3 Chris Redmond letters (.25) Prepared email to clients and counsel (.08) Conferred with Gina Harblson (.42) Conferred with Rae Mosler (.17) Reviewed Chris Redmond letter on Jonesburg (.08) Call to Spencer Desai (.08) Conferred with Spencer Desai (.17) (.17 NO CHARGE)	1.08 480.00/hr 518.40

Harblson v. Patriots Bank

Invoice # 24524

		<u>Hrs/Rate</u>	<u>Amount</u>
11/24/2021	SBR Reviewed subpoena for Mineral Fork Ranch and Airsource (.17) Reviewed Gina Harblson responses and 4 Redmond Letters; Conferred with Rae Mosier (twice) and Mike Silvey; Conferred with Gina Harblson (1.67) (.33 NO CHARGE)	1.50 480.00/hr	720.00
	JV Prepared and continued summary of key points of trial testimony of Brent King (2.67) (1.67 NO CHARGE)	1.00 180.00/hr	180.00
11/26/2021	JV Prepared summary of Brent King deposition (3.83) (2.83 NO CHARGE)	1.00 180.00/hr	180.00
11/28/2021	SBR Prepared motion to compel records from receiver; prepared objections to discovery from Patriots Bank; Prepared objection to receiver's premature demand for records (1.58)	1.58 480.00/hr	758.40
11/29/2021	SBR Reviewed Patriots Bank 4 Affirmative Defenses to Counterclaim (.33) Conferred with Rae Mosier (three times) (.42) Prepared discovery objection to four Request to Produce from Patriots Bank and four letter requests from Chris Redmond (3.83) Prepared Motion to Compel (.58) (.42 NO CHARGE)	4.42 480.00/hr	2,121.60
11/30/2021	SBR Reviewed and revised draft of Motion in Limine (.17) Prepared email to Mike Silvey (.08) Prepared Motion for Protective Order (First Oak Bank) and letter to President Brad Oakes (.92) Conferred with Gina and Chris Harblson (.33) Prepared Mineral Fork Ranch, LLC Motion for Protective Order (1.25) Conferred with Rae Mosier (.42) (.42 NO CHARGE)	2.75 480.00/hr	1,320.00
For professional services rendered		140.58	\$50,153.40

## Additional Charges :

		<u>Qty/Price</u>	
11/29/2021	Photocopies	1,266 0.20	253.20
11/30/2021	Pohlman Court Reporting Job Date: 10/20/21 - Invoice #: 957197 Regina Harblson - Corporate Representative of Black River Motel, LLC	1 335.20	335.20
	Pohlman Court Reporting Job Date: 10/19/21 - Invoice #: 957157 Regina Harblson - Corporate Representative of CRAZ	1 568.69	568.69

Harblson v. Patriots Bank  
 Invoice # 24524

	<u>Qty/Price</u>	<u>Amount</u>
Investments, LLC - VOL II		
11/30/2021 Pohlman Court Reporting	1	595.26
Job Date: 10/20/21 - Invoice #: 957208	595.26	
Regina Harblson - Corporate Representative of CHAB Development, LLC - VOL II		
Pohlman Court Reporting	1	688.55
Job Date: 10/19/21 - Invoice #: 957164	688.55	
Regina Harblson - Corporate Representative of CHAB Development, LLC		
Pohlman Court Reporting	1	1,059.34
Job Date: 10/18/21 - Invoice #: 956771	1,059.34	
Regina Harblson - Corporate Representative of CRAZ Investments, LLC		
Scans	242	48.40
	0.20	
<b>Total costs</b>		<b>\$3,548.64</b>
<b>For professional services rendered</b>	<b>140.58</b>	<b>\$53,702.04</b>
<b>Total amount of this bill</b>		<b>\$53,702.04</b>
<b>Previous balance</b>		<b>\$114,958.99</b>
11/17/2021 Payment - Thank You		<b>(\$75,000.00)</b>
<b>Total payments and adjustments</b>		<b>(\$75,000.00)</b>
<b>Balance due</b>		<b>\$93,661.03</b>

Timekeeper Summary			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joan Vink	57.75	180.00	\$10,395.00
Stephen Rakusin	82.83	480.00	\$39,758.40

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

December 17, 2021

[gina@harbisonlumber.com](mailto:gina@harbisonlumber.com)

Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:

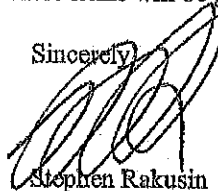
Enclosed please find my bill for services rendered in the above styled case for the period of December 1, 2021 through December 15, 2021.

The total amount due for fees is \$46,881.60. The total amount due for costs this billing period is \$4,246.14. The total amount due for fees and costs this billing period is **\$51,127.74**. You had a previous balance in the amount of \$93,661.03. Payments were received in the amount of \$93,661.03.

**The total amount now due is \$51,127.74.**

Payment is now due. Your prompt payment of these items will be greatly appreciated.

Sincerely,



Stephen Rakusin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

Credit Card # \_\_\_\_\_ Exp. Date / CVV Code: \_\_\_\_\_

SIGNATURE (AS IT APPEARS ON THE CARD)

PRINT NAME (AS IT APPEARS ON THE CARD)

DAYTIME PHONE \_\_\_\_\_

Remit payment to:

Litigation Lawyers,  
Professional Association  
2881 East Oakland Park Blvd., Suite 434  
Ft. Lauderdale, FL 33306



**LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harblson v. Patriots Bank

December 16, 2021

File # 3082.1

Invoice # 24525

## Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
12/1/2021	SBR Prepared email to Mike Silvey with Motion for Protective Order (Mineral Fork Ranch, LLC) (.17) Prepared email to Spencer Desai (.08) Call to Rae Mosler (.08)	0.33 480.00/hr	158.40
12/2/2021	SBR Conferred with Rae Mosler (.08) Prepared for upcoming hearing; Prepared Limine Motion for hearing (6.00) Conferred with Spencer Desai (.08) Conferred with Mike Silvey (.08) Conferred with Rae Mosler (.17) (.25 NO CHARGE)	6.17 480.00/hr	2,961.60
12/3/2021	SBR Prepared for upcoming hearing (5.83) Conferred with Gina Harblson and Chris Harblson (.08) Conferred with Rae Mosler (.17) Call to Mike Silvey; Call to Spencer Desai; Conferred with Mike Silvey (.17) (.17 NO CHARGE)	6.08 480.00/hr	2,918.40
12/4/2021	SBR Traveled to Farmington; Prepared for upcoming trial; Conferred with Rae Mosler (.17) Conferred with Spencer Desai; Met with Gina Harblson and Chris Harblson; Prepared for contempt hearing and receiver fee motion hearing (11.83) (.17 NO CHARGE)	11.67 480.00/hr	5,601.60
12/5/2021	SBR Conferred with Gina Harblson and Chris Harblson; Prepared for upcoming hearing; Met with Chris Harblson; Conferred with Rae Mosler (.17) Met with Junior Flowers; Met with Donnie Marler and Shila Marler; Conferred with Walter Starze; Call to Spencer Desai; Call to Spencer Desai (12.00) (.17 NO CHARGE)	12.00 480.00/hr	5,760.00
12/6/2021	SBR Conferred with Chris Harblson (.08) Prepared for upcoming trial (4 contempt motions/fee payment); Conferred with Spencer Desai; Met with Chris	11.33 480.00/hr	5,438.40

(954) 356-0496

Harblison v. Patriots Bank

Invoice # 24525

		<u>Hrs/Rate</u>	<u>Amount</u>
	Harblison; Reviewed records; Met with Gina Harblison (11.25)		
12/7/2021 SBR	Prepared for upcoming hearing; Attended hearing that continued; Court handled various discovery matters and receiver motions; Met with Mike Silvey, Spencer Desai, Gina Harblison, Chris Harblison and Rae Mosier (telephone); Traveled to St. Louis and returned to Ft. Lauderdale; Prepared reply memo of law (17.25)	17.25 480.00/hr	8,280.00
12/8/2021 SBR	Prepared rebuttal memo of law; Prepared Brent King cross-exam materials; Reviewed 2 Gina Harblison emails; Prepared email to Gina Harblison; Reviewed Mike Silvey/Chris Redmond emails; Reviewed Spencer Desai email (9.00) Conferred with Gina Harblison (.17)	9.17 480.00/hr	4,401.60
12/9/2021 SBR	Researched case law; Prepared surrebuttal brief (7.08) Call to Rae Mosier; Conferred with Rae Mosier (.25) Conferred with Gina Harblison (.17) (.25 NO CHARGE)	7.25 480.00/hr	3,480.00
12/10/2021 SBR	Prepared rebuttal brief (8.42) Prepared email to Mike Silvey and Spencer Desai (.08) Conferred with Mike Silvey (.17) Call to Spencer Desai (.08) Call to Rae Mosier (.08) Prepared materials for upcoming deposition (2.00) (.08 NO CHARGE)	10.75 480.00/hr	5,160.00
12/11/2021 SBR	Conferred with Rae Mosier (.42) Prepared witness packets for upcoming depositions and upcoming trial (2.08) (.42 NO CHARGE)	2.08 480.00/hr	998.40
12/12/2021 SBR	Conferred with Rae Mosier (.17)	0.17 480.00/hr	NO CHARGE
12/13/2021 SBR	Conferred with Chris Harblison and Gina Harblison (.42) Conferred with Chris Harblison (.08) Reviewed email from Gina Harblison (.08) Prepared email to Gina Harblison (.08) Conferred with Gina Harblison (.08) Reviewed Spencer Desai and Mike Silvey email (.08) Prepared discovery schedule for Brad Krantz (.50) Prepared Patriots Bank meeting confer hearing (.17) Conferred with Rae Mosier (.08) (.08 NO CHARGE)	1.50 480.00/hr	720.00
12/14/2021 SBR	Conferred with Rae Mosier (.17) Conferred with Gina Harblison (.08) (.08 NO CHARGE)	0.17 480.00/hr	81.60
12/15/2021 SBR	Prepared deposition notices and discovery schedules for Brad Krsantz and Brent King (1.75) Call to Rae Mosier and Spencer Desai (.08) Conferred with	1.92 480.00/hr	921.60

Harblson v. Patriots Bank  
 Invoice # 24525

	<u>Hrs/Rate</u>	<u>Amount</u>
Spencer Desai (.08) Conferred with Rae Mosler (.25) (.25 NO CHARGE)		
For professional services rendered	97.84	\$46,881.60
Additional Charges :		
	<u>Qty/Price</u>	
12/4/2021 Meals - Buffalo Wild Wings	1 26.28	26.28
12-West	1 65.18	65.18
Additional Box Charge	1 300.00	300.00
Southwest \$420.96 plus additional \$180.00 for flight change	1 600.96	600.96
12/5/2021 Colton's	1 38.90	38.90
12/6/2021 12-West	1 45.00	45.00
12/7/2021 St. Louis Blue Note Airport	1 25.97	25.97
Gas - St. Louis Airport	1 28.34	28.34
AVIS Rent a Car	1 403.65	403.65
Hampton Inn Hotel Farmington Room / Conference Room Charges	1 418.26	418.26
Additional Box Charge	1 450.00	450.00
12/12/2021 Scans	57 0.20	11.40
Photocopies	778 0.20	155.60
12/15/2021 Outstanding Balance from Cross Reporting	1 1,612.20	1,612.20

Harbison v. Patriots Bank  
 Invoice # 24525

	<u>Qty/Price</u>	<u>Amount</u>
12/15/2021 Scans	94 0.20	18.80
Photocopies	228 0.20	45.60
<b>Total costs</b>		<u>\$4,246.14</u>
<b>For professional services rendered</b>	<u>97.84</u>	<u>\$51,127.74</u>
<b>Total amount of this bill</b>		<u>\$51,127.74</u>
<b>Previous balance</b>		\$93,661.03
12/13/2021 Payment - Thank You		(\$93,661.03)
<b>Total payments and adjustments</b>		<u>(\$93,661.03)</u>
<b>Balance due</b>		<u><u>\$51,127.74</u></u>

Timekeeper Summary			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen Rakusin	97.67	480.00	\$46,881.60

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

January 12, 2022

gina@harbisonlumber.com  
Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:

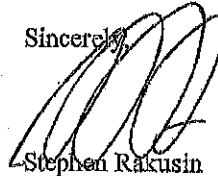
Enclosed please find my bill for services rendered in the above styled case for the period of December 61, 2021 through December 31, 2021.

The total amount due for fees is \$35,116.80. The total amount due for costs this billing period is \$9,610.56. The total amount due for fees and costs this billing period is \$44,727.36. You had a previous balance in the amount of \$51,127.74. Payments were received in the amount of \$0.00.

**The total amount now due is \$95,855.10**

Payment is now due. Your prompt payment of these items will be greatly appreciated.

Sincerely,



Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

Credit Card # \_\_\_\_\_ Exp. Date / CVV Code: \_\_\_\_\_

SIGNATURE \_\_\_\_\_ (AS IT APPEARS ON THE CARD)

PRINT NAME \_\_\_\_\_ (AS IT APPEARS ON THE CARD)

DAYTIME PHONE \_\_\_\_\_

Remit payment to:

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Ft. Lauderdale, FL 33306

**LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harblson v. Patriots Bank

January 12, 2022

File # 3062.1

Invoice # 24531

## Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
12/16/2021	SBR Prepared reply to affirmative defenses to counterclaims for CRAZ Investments, LLC, Black River Motel, LLC, Jonesburg Sawmill & CHAB Development, LLC (1.33) Conferred with Mike Silvey (twice) (.17) Prepared email to Mike Silvey (.08) Prepared discovery schedule for Brent King (.50)	2.08 480.00/hr	998.40
12/17/2021	SBR Prepared discovery schedule for Brad Krantz (.58) Prepared letter to Nick Ziuticky and Chris Redmond (.08)	0.67 480.00/hr	321.60
12/20/2021	SBR Conferred with Chris Harblson (.33) Call to Brad Krantz (.08) Conferred with Rae Mosler (.17) Call and email to Spencer Desai (.08) Conferred with Brad Krantz (.25) Conferred with Rae Mosler (twice) (.25) (.42 NO CHARGE)	0.75 480.00/hr	360.00
12/21/2021	SBR Prepared for upcoming deposition and reviewed receiver record (1.83) Calls and email to Rae Mosler (.08) Call to Brad Krantz and reviewed text message from him (.08) Exchanged various emails with Zach Fairlie (.25) Conferred with Gina Harblson (.08) Conferred with Rae Mosler (.17) Conferred with Chris Harblson (.08) Reviewed Rae Mosler and Spencer Desai emails (.17) (.25 NO CHARGE)	2.50 480.00/hr	1,200.00
12/22/2021	SBR Reviewed process server email (.08) Prepared discovery subpoena schedule for Dave Seidel (.17) Reviewed receiver records (1.75) Conferred with process server at HPF in Kansas City; Prepared deposition notice and intent to issue subpoena for Dave Seidel (.25) Conferred with Chris Rohrer, Esquire (Brad Krantz attorney) (.50)	3.25 480.00/hr	1,560.00
12/23/2021	SBR Reviewed Zach Fairlie email (.08) Prepared letter to Eric Peterson, Chris Redmond and Zach Fairlie (.42) Conferred with Rae Mosler and call to Spencer Desai (.08) Conferred with Spencer Desai and Eric Peterson (.42) Conferred with Rae Mosler (twice) (.17) Reviewed	2.08 480.00/hr	998.40

(954) 356-0496

Harbison v. Patriots Bank

Invoice # 24531

		<u>Hrs/Rate</u>	<u>Amount</u>
	First Missouri Bank Motion for Limited Relief (.17) Reviewed records produced by Receiver (1.00) (.25 NO CHARGE)		
12/24/2021	SBR Reviewed records produced by Receiver (.17)	0.17 480.00/hr	81.60
12/26/2021	SBR Reviewed Receiver records; Reviewed and prepared fee records from Receiver; Prepared for upcoming depositions (3.58)	3.58 480.00/hr	1,718.40
12/27/2021	SBR Prepared for upcoming deposition (Brad Krantz & Brent King) (11.17) Call to Spencer Desai (.08) Reviewed Eric Peterson email; Prepared email to Eric Peterson; Conferred with Spencer Desai; Conferred with Eric Peterson (.25) Conferred with Gina Harbison (twice) (.25) Conferred with Rae Mosier (twice) (.25) (.25 NO CHARGE)	11.75 480.00/hr	5,640.00
12/28/2021	SBR Prepared letter to Chris Rohrer (Brad Krantz counsel); Prepared letter to Eric Peterson, Chris Redmond and Nick Zluticky (1.00) Conferred with Process Server (Robert) (.08) Conferred with Rae Mosier (.25) Conferred with Spencer Desai (.08) Prepared for upcoming deposition (Brad Krantz & Brent King); Traveled to St. Louis (12.50) (.25 NO CHARGE)	13.58 480.00/hr	6,518.40
12/29/2021	SBR Prepared for and attended deposition of Brad Krantz; Conferred with Gina and Chris Harbison (.17) Conferred with Chris Rohrer (Brad Krantz attorney - several times); Conferred with Rae Mosier (.17) Met with Spencer Desai and Eric Peterson (after deposition) (8.17) Conferred with Rae Mosier and Gina and Chris Harbison (.25) Prepared for upcoming deposition of Brent King (4.42) Conferred with Chris Rohrer (.08) (.17 NO CHARGE)	13.08 480.00/hr	6,278.40
12/30/2021	SBR Prepared for and attended deposition of Brent King (11.17) Conferred with Spencer Desai (.33) Conferred with Gina Harbison (.50) Conferred with Rae Mosier (.42) (.42 NO CHARGE)	12.00 480.00/hr	5,760.00
12/31/2021	SBR Traveled to Ft. Lauderdale; Prepared trial cross-exam materials for Brent King; Conferred with Chris and Gina Harbison (7.50) Call to Spencer Desai (.08) Conferred with Deb Kaesley Court Reporter (King & Krantz) (.08)	7.67 480.00/hr	3,681.60
For professional services rendered		<u>73.16</u>	<u>\$35,116.80</u>

Harblson v. Patriots Bank

Invoice # 24531

## Additional Charges :

	<u>Qty/Price</u>	<u>Amount</u>
12/23/2021 HPS Process Service on Brent King	1 90.00	90.00
HPS Process Service on Brent King	1 98.00	98.00
HPS Process Service on Brent King	1 100.00	100.00
NFB Process Service for David Seidel	1 210.00	210.00
12/28/2021 Marriott Hotel	1 411.51	411.51
Bristol Seafood Grill	1 70.85	70.85
Extra Baggage	1 375.00	375.00
Southwest Airlines - St. Louis	1 752.95	752.95
12/29/2021 Annie Gunn's Restaurant	1 78.29	78.29
Golkow Court Reporter - Original & One Certified Copy Deposition of Brad Krantz	1 1,617.15	1,617.15
12/30/2021 Country Club Restaurant	1 21.86	21.86
Deposition of Brent King	1 5,310.70	5,310.70
12/31/2021 Gas	1 5.40	5.40
Blue Note STL Restaurant (Breakfast)	1 19.49	19.49
AVIS Rent a Car	1 244.16	244.16
Scans	184 0.20	36.80
Photocopies	842 0.20	168.40



Harbison v. Patriots Bank

Invoice # 24531

	<u>Amount</u>
<b>Total costs</b>	<b>\$9,610.56</b>

	<u>Amount</u>
<b>For professional services rendered</b>	<b>73.16 \$44,727.36</b>

<b>Total amount of this bill</b>	<b>\$44,727.36</b>
----------------------------------	--------------------

<b>Previous balance</b>	<b>\$51,127.74</b>
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<b>Balance due</b>	<b>\$95,855.10</b>
--------------------	--------------------

Timekeeper Summary			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen Rakusin	73.16	480.00	\$35,116.80

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

January 20, 2022

gina@harbisonlumber.com  
Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:

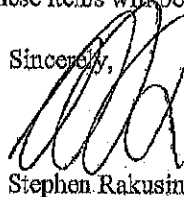
Enclosed please find my bill for services rendered in the above styled case for the period of January 1, 2022 through January 16, 2022.

The total amount due for fees is \$51,926.40. The total amount due for costs this billing period is \$3,857.88. The total amount due for fees and costs this billing period is **\$55,784.28**. You had a previous balance in the amount of \$95,855.10. Payments were received in the amount of \$0.00.

**The total amount now due is \$151,639.38.**

Payment is now due. Your prompt payment of these items will be greatly appreciated.

Sincerely,



Stephen Rakusin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

Credit Card # \_\_\_\_\_ Exp. Date / CVV Code: \_\_\_\_\_

Remit payment to:

SIGNATURE (AS IT APPEARS ON THE CARD)

Litigation Lawyers,  
Professional Association  
2881 East Oakland Park Blvd., Suite 434  
Ft. Lauderdale, FL 33306

PRINT NAME (AS IT APPEARS ON THE CARD)

DAYTIME PHONE \_\_\_\_\_

**LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harblson v. Patriots Bank

January 20, 2022

File # 3062.1

Invoice # 24532

## Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
1/1/2022 SBR Prepared Brent King and Brad Krantz deposition materials for cross-examination; Conferred with Gina Harblson and Chris Harblson (10.42) Conferred with Rae Mosler (twice) (.42) (.42 NO CHARGE)	10.42 480.00/hr	5,001.60
1/2/2022 SBR Conferred with Chris Harblson (.17) Reviewed Gina Harblson's Jonesburg testimony; Prepared for upcoming evidentiary hearing (9.00) Conferred with Rae Mosler (.08) (.08 NO CHARGE)	9.17 480.00/hr	4,401.60
1/3/2022 SBR Traveled to Farmington; Prepared for upcoming trial (16.33) Met with Gina Harblson and Zoey Harblson; Conferred with Mike Silvey; Conferred with Rae Mosler (.25) Conferred with Donnie and Sheila Marler (.33) (.25 NO CHARGE)	16.67 480.00/hr	7,521.60
1/4/2022 SBR Prepared for upcoming trial on contempt; Met with Chris Harblson and Gina Harblson (14.75)	14.75 480.00/hr	7,080.00
1/5/2022 SBR Prepared for and attended trial; Met with Mike Silvey, Spencer Desal and Gina and Chris Harblson; Prepared for upcoming next trial day (Friday) (16.00)	16.00 480.00/hr	7,680.00
1/6/2022 SBR Conferred with Chris and Gina Harblson; Prepared for upcoming trial day (1/7/22) (11.92)	11.92 480.00/hr	5,721.60
1/7/2022 SBR Prepared for and attended trial; Met with Gina Harblson; Conferred with Spencer Desal; Conferred with Rae Mosler (.58) Prepared proposed findings of fact and conclusions of law; Prepared memo to file; Returned to Ft. Lauderdale (14.42) (.58 NO CHARGE)	14.42 480.00/hr	6,921.60

(954) 366-0496

Harbison v. Patriots Bank

Invoice # 24532

		<u>Hrs/Rate</u>	<u>Amount</u>
1/8/2022	SBR Prepared proposed findings of fact; conclusions of law and proposed Final Judgment (3.33)	3.33 480.00/hr	1,598.40
1/9/2022	SBR Conferred with Chris Harbison and Gina Harbison; Prepared designation for Adam Plepke deposition; Prepared Final Judgment on Motion to Vacate and second motion for appointment of a receiver (6.92)	5.92 480.00/hr	2,841.60
1/10/2022	SBR Prepared email to co-counsel & Gina Harbison; Prepared proposed finding of fact and conclusions of law and proposed Final Judgment (2.92)	2.92 480.00/hr	1,401.60
1/11/2022	SBR Conferred with Rae Mosier (twice) (.17) Reviewed form of proposed motion for protective order (.67) Reviewed Eric Peterson's email (.17) Conferred with Rae Mosier (.42) Conferred with Gina Harbison (.17) (.58 NO CHARGE)	1.00 480.00/hr	480.00
1/12/2022	SBR Prepared email to Mike Silvey (.08)	0.08 480.00/hr	38.40
1/13/2022	SBR Conferred with Chris Harbison (.17) Conferred with Rae Mosier (.08) Reviewed Spencer Desai email and draft motion for protective order (.17) Conferred with Spencer Desai (.25) Conferred with Gina Harbison and Chris Harbison (.25) Conferred with Rae Mosier (.17) (.25 NO CHARGE)	0.83 480.00/hr	398.40
1/14/2022	SBR Reviewed Gina Harbison email and privilege log (.17) Reviewed Gina Harbison email on attempted plane sale (.08) Conferred with Gina Harbison (.17) Reviewed Patriots Bank Adam Plepke Deposition Designations (1.25) Conferred with Gina Harbison (.08) Call to Spencer Desai (.08) Conferred with Rae Mosier (.08) (.08 NO CHARGE)	1.67 480.00/hr	801.60
1/16/2022	SBR Conferred with Spencer Desai (.08) Conferred with Rae Mosier (.08) (.08 NO CHARGE)	0.08 480.00/hr	38.40

For professional services rendered

108.18 \$51,926.40

Additional Charges :

	<u>Qty/Price</u>	
1/3/2022 Hotel - Conference Room	1 474.03	474.03
12 West - Dinner	1 38.00	38.00

Harbison v. Patriots Bank

Invoice # 24532

	<u>Qty/Price</u>	<u>Amount</u>
1/3/2022 Southwest Airlines - Extra Baggage (Boxes)	1 525.00	525.00
Southwest Airlines	1 609.57	609.57
Hotel	1 557.68	557.68
1/5/2022 12 West - Dinner	1 58.00	58.00
1/7/2022 Blue Note - St. Louis Airport	1 20.35	20.35
Gas	1 44.12	44.12
Southwest (Change Fee)	1 143.20	143.20
Southwest - Extra Baggage	1 225.00	225.00
Avis Car Rental	1 1,162.93	1,162.93
Total costs		<u>\$3,857.88</u>
For professional services rendered	108.18	<u>\$55,784.28</u>
Total amount of this bill		<u>\$55,784.28</u>
Previous balance		<u>\$95,855.10</u>
Balance due		<u><u>\$151,639.38</u></u>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen Rakusin	108.18	480.00	\$51,926.40

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

February 1, 2022

gina@harbisonlumber.com  
Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:


Enclosed please find my bill for services rendered in the above styled case for the period of January 17, 2022 through January 31, 2022.

The total amount due for fees is \$44,280.00. The total amount due for costs this billing period is \$436.60. The total amount due for fees and costs this billing period is **\$44,716.60**. You had a previous balance in the amount of \$151,639.38. Payments were received in the amount of \$0.00.

**The total amount now due is \$196,355.98.**

Payment is now due. Your prompt payment of these items will be greatly appreciated.

Sincerely,



Stephen Rakusin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

Credit Card # \_\_\_\_\_ Exp. Date / CVV Code: \_\_\_\_\_

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Ft. Lauderdale, FL 33306

**LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harbison v. Patriots Bank

February 01, 2022

File # 3062.1

Invoice # 24533

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
1/17/2022 SBR Conferred with Rae Mosier (several times) (.25) Conferred with Chris Harbison (.08) Prepared proposed Final Judgment (.33) Reviewed Brent King's trial testimony from December 5, 2021 (and annotated it) (3.17) Conferred with Mike Silvey (.08) Conferred with Spencer Desai (.08) Conferred with Gina Harbison (.08) (.25 NO CHARGE)	3.92 480.00/hr	1,881.60
1/18/2022 SBR Conferred with Gina Harbison (.08) Prepared proposed judgment (4.42)	4.50 480.00/hr	2,160.00
1/19/2022 SBR Conferred with Chris Harbison (twice) (.17) Prepared proposed final judgment (3.92)	4.08 480.00/hr	1,958.40
1/20/2022 SBR Prepared proposed final judgment, findings of fact and conclusions of law (5.75) Conferred with Mike Silvey (.17) Conferred with Rae Mosier (.17) Call to Spencer Desai (.08) Conferred with Chris Harbison (.17) (.17 NO CHARGE)	6.17 480.00/hr	2,961.60
1/21/2022 SBR Prepared proposed final judgments; Prepared proposed order on 2d motion for appointment of a receiver (6.83) Conferred with Spencer Desai (.08) Conferred with Gina Harbison (.08) Conferred with Rae Mosier (.17) (.17 NO CHARGE)	7.00 480.00/hr	3,360.00
1/22/2022 SBR Prepared proposed findings of fact, conclusions of law and orders (7.17)	7.17 480.00/hr	3,441.60
1/23/2022 SBR Prepared 8 proposed orders and final judgment (12.33)	12.33 480.00/hr	5,918.40
1/24/2022 SBR Prepared proposed 8 Final Judgment's (12.00) Prepared email to Nick Zluticky, Esquire (.08) Prepared email to Mike Silvey (.17)	12.25 480.00/hr	5,880.00

(954) 356-0496

Harblson v. Patriots Bank

Invoice # 24533

		<u>Hrs/Rate</u>	<u>Amount</u>
1/25/2022	SBR Conferred with Rae Mosier (.17) Prepared proposed 8 orders on motion to vacate and second motion for appointment of a receiver (5.67) Call to Mike Silvey (.08) Call to Spencer Desai (.08) Conferred with Gina Harblson (.08) Conferred with Rae Mosier (.08) Conferred with Mike Silvey (.17) (.25 NO CHARGE)	6.08 480.00/hr	2,918.40
1/26/2022	SBR Prepared proposed order on second motion for appointment of a receiver (12.92) Conferred with Spencer Desai (twice) (.25) Conferred with Rae Mosier (.08) (.08 NO CHARGE)	13.17 480.00/hr	6,321.60
1/27/2022	SBR Reviewed Plaintiff's 2 proposed orders (Motion to Vacate and Second Motion to Appoint Receiver) (.25) Call to Spencer Desai (.08) Conferred with Rae Mosier (twice) (.25) Organized materials from judgments (2.00) Conferred with Spencer Desai (.08) Conferred with Gina Harblson (.08) (.25 NO CHARGE)	2.42 480.00/hr	1,161.60
1/28/2022	SBR Conferred with Gina Harblson (.42) Conferred with Rae Mosier and Gina Harblson (Quickbooks issue) (.58) Researched case law (2.00) Call to Spencer Desai (.08) Conferred with Gina Harblson (.08) Conferred with Spencer Desai (.08) Call to Rae Mosier (.08) Numerous phone calls with Chris Harblson, Gina Harblson, Spencer Desai (.75) Conferred with Mike Silvey (.33) Conferred with Chris Harblson (.08) (.08 NO CHARGE)	4.33 480.00/hr	2,078.40
1/29/2022	SBR Conferred with Rae Mosier, Gina Harblson and Chris Harblson (1.08) Conferred with Rae Mosier (.08) Researched case law (1.67) Conferred with Chris Harblson (.08) Conferred with Mike McDorman (.75) (.08 NO CHARGE)	3.58 480.00/hr	1,718.40
1/30/2022	SBR Conferred with Rae Mosier (twice) (.50) Prepared materials for motion to dismiss (CHAB - Washington Co. and CHAB Camden Co.) Researched case law at Nova Law Library (2.17) (.50 NO CHARGE)	3.17 480.00/hr	1,521.60
1/31/2022	SBR Conferred with Mike Silvey (.17) Conferred with Rae Mosier (.08) Researched case law and prepared motion to dismiss (two CHAB fraud transfer cases) (1.92) (.08 NO CHARGE)	2.08 480.00/hr	998.40
For professional services rendered		<u>92.25</u>	<u>\$44,280.00</u>



Harblson v. Patriots Bank

Invoice # 24533

Additional Charges :

	<u>Qty/Price</u>	<u>Amount</u>
1/27/2022 Scans	464 0.20	92.80
Photocopies	1,719 0.20	343.80
<b>Total costs</b>		<u>\$436.60</u>
<b>For professional services rendered</b>	<u>92.25</u>	<u>\$44,716.60</u>
<b>Total amount of this bill</b>		<u>\$44,716.60</u>
<b>Previous balance</b>		<u>\$151,639.38</u>
<b>Balance due</b>		<u><u>\$196,355.98</u></u>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen Rakusin	92.25	480.00	\$44,280.00

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

February 17, 2022

[gina@harbisonlumber.com](mailto:gina@harbisonlumber.com)  
Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:

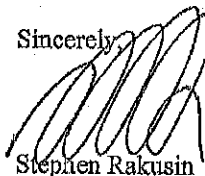
Enclosed please find my bill for services rendered in the above styled case for the period of February 1, 2022 through February 15, 2022.

The total amount due for fees is \$9,916.80. The total amount due for costs this billing period is \$3,088.24. The total amount due for fees and costs this billing period is **\$13,005.04**. You had a previous balance in the amount of \$196,355.98. Payments were received in the amount of \$0.00.

**The total amount now due is \$209,361.02.**

Payment is now due. Your prompt payment of these items will be greatly appreciated.

Sincerely,



Stephen Rakusin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

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Credit Card # \_\_\_\_\_ Exp. Date / CVV Code: \_\_\_\_\_

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**LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harblison v. Patriots Bank

February 17, 2022

File # 3062.1

Invoice # 24536

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
2/1/2022 SBR Reviewed various Spencer Desai emails (.17) Call to Spencer Desai (.08) Prepared Motion to Dismiss, Strike and for More Definite Statement on Mineral Fork Ranch (1.92) Conferred with Gina Harblison (.25) Conferred with Spencer Desai (.08) Conferred with Spencer Desai and Gina Harblison (.25) Prepared 3 emails to Mike Silvey; Reviewed Zach Fairlie email; Conference call with Eric Peterson, Zach Fairlie, and Spencer Desai (2.08)	4.83 480.00/hr	2,318.40
2/3/2022 SBR Call to Chris Harblison (.08) Conferred with Gina Harblison (.17) Conferred with Rae Mosler (.08) (.08 NO CHARGE)	0.25 480.00/hr	120.00
2/4/2022 SBR Conferred with Rae Mosler (.25) Prepared Motion to Dismiss for GSB Investing case (.25) Conferred with Chris Harblison (.08) Conferred with Mike Silvey (.08) Conferred with Eric Peterson, Zach Fairlie and Spencer Desai (.42) Conferred with Julian Kuszmaul; Conferred with Chris and Gina Harblison (.25) (.25 NO CHARGE)	1.00 480.00/hr	480.00
2/5/2022 SBR Conferred with Rae Mosler (.08)	0.08 480.00/hr	NO CHARGE
2/7/2022 SBR Prepared Motion to Dismiss revisions (GSB Investing); Conferred with Julian Kuszmaul on GSB Investing (.33) Prepared interrogatories and request to produce to Patriots Bank on GSB Investing (1.00)	1.33 480.00/hr	638.40
2/9/2022 SBR Researched case law for upcoming hearing (Mineral Fork Ranch) (1.25) Reviewed Julian Kuszmaul email filing (.08) Conference with Receiver's Counsel; Attended phone conference with Zack Fairlie, Eric Peterson and Spencer Desai (1.75) Conferred with Spencer Desai (.25) Conferred with Gina Harblison (.08) Conferred with Rae Mosler (.08) Reviewed Zach	3.50 480.00/hr	1,680.00

(954) 356-0496

Harbison v. Patriots Bank  
 Invoice # 24536

Page 2

		<u>Hrs/Rate</u>	<u>Amount</u>
	Fairlie email to judge (.08) (.08 NO CHARGE)		
2/10/2022	SBR Researched fraud transfer case law (3.83) Conferred with Chris Harbison (.08) Prepared memo to file on missing items (2.00) Conferred with Rae Mosier (.08) Reviewed executed Order on Pro Hac admisson in GSB Investing case (.08) Reviewed Order on Pro Hac admisson in Washington County case (.08) Reviewed Washington County Notice of Hearing on Motion to Dismiss (.08) (.08 NO CHARGE)	6.17 480.00/hr	2,961.60
2/11/2022	SBR Prepared email to Rae Mosler (.08) Conferred with Rae Mosier (.08)	0.17 480.00/hr	NO CHARGE
	SBR Prepared hearing materials for both fraudulent transfer cases; Researched case law (.58)	0.58 480.00/hr	278.40
2/14/2022	SBR Call to Chris Harbison and Gina Harbison (.08) Conferred with Chris Harbison (.17) Prepared fraud transfer hearing packet for Mineral Fork Ranch (1.17) Prepared list of personal property (claimed to be missing) (.42)	1.83 480.00/hr	878.40
2/15/2022	SBR Prepared hearing packet and case law for Mineral Fork Ranch, LLC; Researched case law and prepared email to Mike Silvey, Esquire (1.08) Conferred with Mike Silvey, Esquire (.08)	1.17 480.00/hr	561.60
<b>For professional services rendered</b>		<b>20.91</b>	<b>\$9,916.80</b>

Additional Charges :

	<u>Qty/Price</u>	
2/5/2022 MO Supreme Court - Pro Hac Fees	1 8.82	8.82
MO Supreme Court - Pro Hac Fees	1 8.82	8.82
MO Supreme Court - Pro Hac Fees	1 410.00	410.00
MO Supreme Court - Pro Hac Fees	1 410.00	410.00
2/15/2022 Audio Transcription - Patriots Bank v. Black River for January 22, 2022	1 2,180.80	2,180.80

Harblson v. Patriots Bank  
Invoice # 24538

Page 3

	<u>Qty/Price</u>	<u>Amount</u>
2/16/2022 Scans	28 0.20	5.60
Photocopies	321 0.20	64.20
<b>Total costs</b>		<u>\$3,088.24</u>
<b>For professional services rendered</b>	<u>20.91</u>	<u>\$13,005.04</u>
<b>Total amount of this bill</b>		<u>\$13,005.04</u>
<b>Previous balance</b>		<u>\$196,355.98</u>
<b>Balance due</b>		<u><u>\$209,361.02</u></u>

Timekeeper Summary				
<u>Name</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen Rakusin		20.66	480.00	\$9,916.80

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**  
2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

March 3, 2022

gina@harbisonlumber.com  
Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:

Enclosed please find my bill for services rendered in the above styled case for the period of February 16, 2022 through February 28, 2022.

The total amount due for fees is \$6,235.20. The total amount due for costs this billing period is \$46.80. The total amount due for fees and costs this billing period is **\$6,282.00**. You had a previous balance in the amount of \$209,361.02. Payments were received in the amount of \$15,000.00.

**The total amount now due is \$200,643.02.**

Payment is now due. Your prompt payment of these items will be greatly appreciated.

Sincerely,



Stephen Rakusin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

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**LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harbison v. Patriots Bank

March 03, 2022

File # 3062.1

Invoice # 24541

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
2/16/2022	SBR Conferred with Julian Kuszmaul (GSB Investing case) (.17) Prepared email to Mike McDorman (.17) Prepared revised Interrogatories (2.00) Conferred with Rae Mosler (.08) (1.08 NO CHARGE)	1.33 480.00/hr	638.40
2/17/2022	SBR Prepared memos to file on list of missing items (.50) Prepared email to Gina Harblson (.17) Reviewed Eric Peterson email (.08)	0.75 480.00/hr	360.00
2/18/2022	SBR Conferred with Rae Mosler (twice) (.33) Conferred with Mike Silvey (.17) Conferred with Julian Kuszmaul (.17) Conferred with Chris Harbison and Gina Harblson (.25) Conferred with Mike Silvey (.25) Call and email to Spencer Desal (.08) Conferred with Gina Harblson (.17) Reviewed email from Zach Fairlie and Receiver's 2 reports of missing items (.33) Call and email to Eric Peterson (.08) Reviewed Spencer Desal email; subpoena to Receiver and Amended subpoena and Bank Motion to Compel (.33) Call to Spencer Desal (.08) Conferred with Gina Harblson (.08) (.33 NO CHARGE)	2.00 480.00/hr	960.00
2/21/2022	SBR Prepared email to Eric Peterson (.08) Reviewed email from Eric Peterson (.08) Conferred with Rae Mosler (.08) Prepared Motion for Protective Order (Patriots Bank Subpoena to Receiver) (1.67) Conferred with Gina Harblson (.17) Reviewed Nick Zluticky, Esquire email (Mineral Fork Ranch case) (.08) Call to Nick Zluticky, Esquire (.08) Reviewed Julian Kuszmaul email (.08) Call and email to Mike Silvey (.08) Conferred with Mike Silvey (Mineral Fork Ranch case) (.08) Call to Spencer Desal (.08) (.08 NO CHARGE)	2.42 480.00/hr	1,161.60
2/22/2022	SBR Prepared motion for protective order (Receivership Subpoena) (3.42) Conferred with Mike Silvey (.17) Call to Gina Harblson (.08) Prepared email to Mike Silvey,	3.25 480.00/hr	1,560.00

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Harblson v. Patriots Bank  
 Invoice # 24541

		<u>Hrs/Rate</u>	<u>Amount</u>
	Spencer Desai, Rae Mosler and Gina Harblson (.08) Call to Spencer Desai (.08) Conferred with Rae Mosler (.08) (.67 NO CHARGE)		
2/23/2022	SBR Reviewed 2 Zach Fairlie emails (.17) Conferred with Spencer Desai (.17) Conferred with Mike Silvey (.08) Call to Chris Harblson and Gina Harblson (.08) Conferred with Gina Harblson and Chris Harblson (.17) Conferred with Rae Mosler (.33) Reviewed 2 Nick Zluticky emails (.17) (.33 NO CHARGE)	0.83 480.00/hr	398.40
2/24/2022	SBR Reviewed lists of missing items / Receiver's list / Harblson list (.58) Conference call with Eric Peterson, Zach Fairlie and Spencer Desai (.67) Conferred with Spencer Desai (.25) Conferred with Rae Mosler (.25) Conferred with Gina Harblson (.17) Organized case research (fraudulent transfer cases) (.17) (.25 NO CHARGE)	1.83 480.00/hr	878.40
2/25/2022	SBR Conferred with Rae Mosler (several times) (.50) Prepared email to Eric Peterson and Zach Fairlie (.17) Conferred with Gina Harblson (twice) (.17) (.50 NO CHARGE)	0.33 480.00/hr	158.40
2/27/2022	SBR Conferred with Chris Harblson (.08) Reviewed Mike Silvey email and prepared memo to file (.08)	0.17 480.00/hr	81.60
2/28/2022	SBR Reviewed hearing notice in Mineral Fork Ranch case (.08)	0.08 480.00/hr	38.40

**For professional services rendered**

<b>12.99</b>	<b>\$6,235.20</b>
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**Additional Charges :**

	<u>Qty/Price</u>	
2/23/2022 Photocopies	101 0.20	20.20
Scans	133 0.20	26.60

**Total costs**

<b>\$46.80</b>
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**For professional services rendered**

<b>12.99</b>	<b>\$6,282.00</b>
--------------	-------------------

**Total amount of this bill**

<b>\$6,282.00</b>
-------------------

**Previous balance**

<b>\$209,361.02</b>
---------------------



Harblson v. Patriots Bank  
Invoice # 24541

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	<u>Amount</u>
2/28/2022 Payment - Thank You	<u>(\$15,000.00)</u>
Total payments and adjustments	<u>(\$15,000.00)</u>
Balance due	<u>\$200,643.02</u>

Timekeeper Summary			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen Rakusin	12.99	480.00	\$6,235.20

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

March 18, 2022

[gina@harbisonlumber.com](mailto:gina@harbisonlumber.com)

Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:

Enclosed please find my bill for services rendered in the above styled case for the period of March 1, 2022 through March 15, 2022.

The total amount due for fees is \$30,273.60. The total amount due for costs this billing period is \$650.95. The total amount due for fees and costs this billing period is **\$30,924.55**. You had a previous balance in the amount of \$200,643.02. Payments were received in the amount of \$10,000.00.

**The total amount now due is \$221,567.57.**

Payment is now due. Your prompt payment of these items will be greatly appreciated.

Sincerely,



Stephen Rakysin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_

File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

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Ft. Lauderdale, FL 33306

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LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harbison v. Patriots Bank

March 18, 2022

File # 3062.1

Invoice # 24543

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
3/1/2022 SBR Conferred with Gina Harbison on "missing" items and receiver conference call (1.42) Prepared email to Spencer Desai (.08)	1.50 480.00/hr	720.00
3/2/2022 SBR Prepared email to Spencer Desai (.08) Prepared Brent King materials and opposition to fee approval requests (1.00) Reviewed GSB Investing records (.25) Conferred with Gina Harbison (.25) Reviewed GSB Investing emails with Patriots Bank (.17) Conferred with Jullan Kuszmaul (.17) Conferred with Gina Harbison and Chris Harbison (.17) Reviewed Gina Harbison email (.25) Conferred with Rae Mosler (.25)n (.25 NO CHARGE)	2.33 480.00/hr	1,118.40
3/3/2022 SBR Reviewed Index to Patriots Bank records (.17) Reviewed Gina Harbison email and attachments (Jonesburg) (.33) Conference call with Spencer Desai and Gina Harbison (prepared for receivership property meeting) (1.42) Reviewed Leo Nelson emails (.17) Conferred with Mike Silvey (.17) Prepared Motion for Protective Order (Investor Title); Conferred with Leo Nelson (Leon Basler's attorney) (.42) Conferred with Gina Harbison (.08) Prepared Motion for Protective Order (Investors Title Co.) (2.25) Conferred with Spencer Desai (.25) Conferred with Chris Harbison (.25) Conferred with Mike Silvey (.08) Conferred with Gina Harbison (.08) Conferred with Rae Mosler (.08) (.08 NO CHARGE)	5.50 480.00/hr	2,640.00
3/4/2022 SBR Conferred with Gina Harbison (.25) Prepared Mineral Fork Ranch's revised Motion for Protective Order (Investors Title Co.) (.08) Prepared email to Mike Silvey (.08) Conferred with Chris Harbison (.08) Prepared email to Leo Nelson (Basler with attachments - security agreements) and reviewed various CHAB loan records and security agreements (.92) Prepared email to Nick Zluficky, Esquire on	1.58 480.00/hr	768.40

(954) 356-0496

Harbison v. Patriots Bank

Invoice # 24543

007

		<u>Hrs/Rate</u>	<u>Amount</u>
	Mineral Fork Ranch (.08) Conferred with Mike Silvey (.08) Conferred with Leo Nelson (Basler attorney) (.08)		
3/5/2022	SBR Conferred with Rae Mosler (.67)	0.67 480.00/hr	NO CHARGE
3/6/2022	SBR Prepared response to Receiver fee motions (.58)	0.58 480.00/hr	278.40
3/7/2022	SBR Call to Leo Nelson (Leon Basler's attorney) (.08)	0.08 480.00/hr	38.40
3/8/2022	SBR Conferred with Gina Harbison (.08) Prepared materials for objections to fee requests (1.33)	1.42 480.00/hr	681.60
3/9/2022	SBR Researched case law and receiver's fees and prepared fee objection materials (2.83) Conferred with Leo Nelson (Leon Basler's attorney) (.08) Conferred with Chris Redmond (.17) Conferred with Julian Kuzmaul (GSB Investing on March 10) (.17) Conferred with Chris Harbison (numerous times) (.67) Conferred with Mike Silvey (.17) Conferred with Rae Mosler (.08) Call to Spencer Desai (.08) (.08 NO CHARGE)	4.00 480.00/hr	1,920.00
3/10/2022	SBR Prepared objections to fee motions (receiver and counsel) and memorandum of law (2.92) Conferred with Chris Harbison (.08) Call to Mike McDorman (.08) Conferred with Julian Kuzmaul on GSB Investing case dismissal (.17) Traveled to law library and researched case law (3.75) (1.25 NO CHARGE)	5.75 480.00/hr	2,760.00
3/11/2022	SBR Prepared objection to fees and memo of law; researched case law (10.33) Reviewed 2 emails from Cindy Hauser in Chris Redmond's office and fee records (.25) Reviewed Gina Harbison email on GSB Investing suit (.08) Reviewed Mineral Fork Ranch, LLC loan documents (.25)	10.92 480.00/hr	5,241.60
3/12/2022	SBR Researched case law; prepared memo of law (objection to fees of receiver and his attorneys) (7.83)	7.83 480.00/hr	3,758.40
3/13/2022	SBR Researched case law; Prepared objections to recover fees; Prepared memo of law (objection to fees of receiver and his attorneys) (6.58) Conferred with Rae Mosler (.17) Call to Spencer Desai (.08) Conferred with Gina Harbison (.17) (.17 NO CHARGE)	7.00 480.00/hr	3,360.00
3/14/2022	SBR Reviewed Gina Harbison email (.08) Prepared notice of objections to requests for fees (receiver and professional); Researched case law (4.58) Conferred with Gina Harbison (.17) Call to Spencer Desai (.08)	9.25 480.00/hr	4,440.00

007

007

Harbison v. Patriots Bank  
 Invoice # 24543

	<u>Hrs/Rate</u>	<u>Amount</u>
Conferred with Spencer Desal (.08) Prepared memorandum of law (4.08) Reviewed 2 Spencer Desal emails (.17)		
3/15/2022 SBR Reviewed notices to cure from Zach Fairlie (and attachments); Prepared email to client and counsel (.25) Conferred with Gina Harbison (.17) Conferred with Rae Mosier (.17) Organized Chris Redmond fee records; Prepared objection to motion to borrow (3.42) Reviewed 5 Chris Redmond motions to approve payment (January 2022) (.50) Conferred with Gina Harbison and Spencer Desal (.50) Conferred with Spencer Desal (.25) Conferred with Gina Harbison (.25) (.17 NO CHARGE)	5.33 480.00/hr	2,558.40
For professional services rendered	63.74	\$30,273.60
Additional Charges :		
	<u>Qty/Price</u>	
3/8/2022 Scans	103 0.20	20.60
Photocopies	136 0.20	27.20
3/15/2022 Pohlman Court Reporting (was not previously billed) Invoice #: 958210 Invoice Date: 11/5/2021 Job Date: 11/3/2021 Regina Harbison - Corporate Representative of Jonesburg Sawill & Pallet Co., Inc.	1 603.15	603.15
Total costs		\$650.95
For professional services rendered	63.74	\$30,924.55
Total amount of this bill		\$30,924.55
Previous balance		\$200,643.02
3/3/2022 Payment - Thank You		(\$10,000.00)
Total payments and adjustments		(\$10,000.00)
Balance due		\$221,567.57

Harblson v. Patriots Bank  
Invoice # 24543

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Name	Timekeeper Summary	Hours	Rate	Amount
Stephen Rakusin		63.07	480.00	\$30,273.60

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

April 1, 2022

gina@harbisonlumber.com  
Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:

Enclosed please find my bill for services rendered in the above styled case for the period of March 16, 2022 through March 31, 2022.

The total amount due for fees is \$49,233.60. The total amount due for costs this billing period is \$2,160.33. The total amount due for fees and costs this billing period is **\$51,393.93**. You had a previous balance in the amount of \$221,567.57. Payments were received in the amount of \$45,000.00.

**The total amount now due is \$227,961.50.**

Payment is now due. Your prompt payment of these items will be greatly appreciated.

Sincerely,

  
Stephen Rakusin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

Credit Card # \_\_\_\_\_ Exp. Date / / CVV Code: \_\_\_\_\_

Remit payment to:

SIGNATURE \_\_\_\_\_ (AS IT APPEARS ON THE CARD)

PRINT NAME \_\_\_\_\_ (AS IT APPEARS ON THE CARD)

Litigation Lawyers,  
Professional Association  
2881 East Oakland Park Blvd., Suite 434  
Ft. Lauderdale, FL 33306

DAYTIME PHONE \_\_\_\_\_

**LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION**

2861 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harblson v. Patriots Bank

April 01, 2022

File # 3062.1

Invoice # 24544

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
3/16/2022	SBR	6.75 480.00/hr	3,240.00
	Conferred with Rae Mosler (.17) Reviewed Phil Shechter email (.08) Reviewed summons returns on Cameron Cooper and Scott Cooper (.17) Call to Mike Silvey (.08) Conferred with Mike Silvey (.33) Prepared materials for March 29, 2022 hearing (1.00) Reviewed Bank memo of law in Basler case (.25) Conferred with Rae Mosler (.08) Prepared memo of law (4.25) Conference call with Zach Fairlie, Eric Peterson, Spencer Desai and Brent King; Conferred with Spencer Desai (.17) (.25 NO CHARGE)		
3/17/2022	SBR	8.83 480.00/hr	4,238.40
	Prepared memo of law; Researched case law; Reviewed Chris Redmond fee records (10.83) (2.00 NO CHARGE)		
3/18/2022	SBR	6.67 480.00/hr	3,201.60
	Prepared memo of law; Reviewed fee records of Receiver and his counsel (6.67) Conferred with Mike McDorman on GSB Investing (.08) Conferred with Rae Mosler (.33) (.33 NO CHARGE)		
3/19/2022	SBR	4.58 480.00/hr	2,198.40
	Reviewed Receiver December fee records; Prepared memo to file; Prepared charts; Call to Gina Harblson; Prepared memo of law (4.58)		
3/20/2022	SBR	4.33 480.00/hr	2,078.40
	Prepared memo of law; Prepared fee charts (4.33)		
3/21/2022	SBR	5.33 480.00/hr	2,558.40
	Prepared memo of law; Prepared fee charts; Researched case law (4.33) Reviewed appraisal report for CHAB real estate (.83) (Washington County) Reviewed materials on First Oak Bank (Mineral Fork Ranch) (.25) Reviewed Brad Krantz Patriots Bank Litigation Docket (.08) Call to Spencer Desai (.08) Reviewed Gina Harblson Cross-Exam transcript (PB) (.08) Conferred with Gina Harblson (.17) Call to Spencer Desai (.08) Reviewed Patriots Bank Memo of Law on Motion to Dismiss in		

(954) 356-0496



Harblson v. Patriots Bank

Invoice # 24544

		<u>Hrs/Rate</u>	<u>Amount</u>
	Mineral Fork Ranch case (.17) Reviewed Spencer Desal email and attachments (.08)		
3/22/2022 SBR	Prepared written objection to Motion to Sell CHAB airplanes; Prepared memo of law and charts on fee objection (7.67) Conferred with Chris Harblson (.25) Conferred with Mike Silvey (.17) Conferred with Gina Harblson (.25) Conferred with Rae Mosler (.8) Call to Spencer Desal (.08) (.08 NO CHARGE)	8.42 480.00/hr	4,041.60
3/23/2022 SBR	Prepared notice and objection to motion to sell aircraft (.92) Conferred with Chris Harblson (.08) Prepared memo of law and charts on fee objections (5.08)	6.08 480.00/hr	2,918.40
3/24/2022 SBR	Prepared charts; Prepared memo of law (fee objection) (3.25) Call to Gina Harblson; Call to Spencer Desal (.17) Conferred with Rae Mosler (.17) Conferred with Mike Silvey (.08) Reviewed Patriots Bank's First Status Report in Mineral Fork Ranch case (.08) Conferred with Rae Mosler (.25) Conferred with Chris Harblson (.08) Conferred with Gina Harblson (.08) (.42 NO CHARGE)	3.92 480.00/hr	1,881.60
3/25/2022 SBR	Prepared memo of law (5.83) Conferred with Rae Mosler (.08) Conferred with Spencer Desal (.17) Conferred with Gina Harblson (twice) (.17) Conferred with Mike Silvey (.17) (.08 NO CHARGE)	6.33 480.00/hr	3,038.40
3/26/2022 SBR	Prepared memo of law; Prepared memo to file; Prepared for upcoming hearing (motion) (4.33) Reviewed First Missouri Opposition Memo to Receiver's Motion to Borrow (.17) Call to Gina Harblson (.08) Conferred with Rae Mosler (.08) Conferred with Mike Silvey (.08) (.08 NO CHARGE)	4.67 480.00/hr	2,241.60
3/27/2022 SBR	Prepared for upcoming hearing; Researched case law; Prepared fee objection chart (7.75)	7.75 480.00/hr	3,720.00
3/28/2022 SBR	Traveled to Farmington, Missouri; Prepared for upcoming hearing (11.08) Conferred with Gina Harblson; Call to Robert Hammeke (First Missouri Lawyer); Conferred with Mike Silvey (.25) Conferred with Spencer Desal (.25) Conferred with Robert Hammeke (.08) Met with Gina Harblson and conferred with Chris Harblson (3.17) (2.00 NO CHARGE)	12.83 480.00/hr	6,158.40
3/29/2022 SBR	Prepared for and attended Motion Calendar hearing in Potosi; Met with Mike Silvey; Met with Gina Harblson and Chris Harblson; Traveled to St. Louis / Ft. Lauderdale (14.17) Conferred with Rae Mosler (twice) (.42) Conferred with Gina Harblson (.08) Conferred with	13.58 480.00/hr	6,518.40

Harblson v. Patriots Bank  
 Invoice # 24544

	<u>Hrs/Rate</u>	<u>Amount</u>
Spencer Desai (.33) Prepared fee opposition materials (1.42 NO CHARGE)		
3/30/2022 SBR Prepared Motion for Summary Judgment materials for Mineral Fork Ranch and GSB Investing lawsuits (.08) Organized hearing packets (.17) Prepared demand letter for receivership fees (.08) Reviewed Bank's response to see Receiver's objection (.08) Reviewed subpoenas for Chris Harblson (.08) Reviewed Eric Peterson email and list of bank statements (.08) Reviewed Julian Kuszmaul email (.08) Conferred with Gina Harblson (.17) Conferred with Chris Harblson (.08) Conferred with Rae Mosler (.25) (.25 NO CHARGE)	1.92 480.00/hr	921.60
3/31/2022 SBR Conferred with Leo Nelson (Leon Basler's attorney) (.08) Prepared email to Gina Harblson (.08) Conferred with Chris Harblson (.42)	0.58 480.00/hr	278.40
For professional services rendered	102.57	\$49,233.60
Additional Charges :		
	<u>Qty/Price</u>	
3/28/2022 Enterprise	1 211.06	211.06
Diner	1 14.63	14.63
Dinner - 12 West	1 42.00	42.00
Hampton Inn	1 171.16	171.16
Southwest	1 774.96	774.96
3/29/2022 Gas	1 26.68	26.68
Dinner	1 90.00	90.00
Conference Room at Hampton Inn	1 135.44	135.44
3/30/2022 Scans	248 0.20	49.20

Harblson v. Patriots Bank  
 Invoice # 24544

	<u>Qty/Price</u>	<u>Amount</u>
3/30/2022 Photocopies	3,226 0.20	645.20
<b>Total costs</b>		<b>\$2,160.33</b>
<b>For professional services rendered</b>	<b>102.57</b>	<b>\$51,393.93</b>
<b>Total amount of this bill</b>		<b>\$51,393.93</b>
<b>Previous balance</b>		<b>\$221,667.57</b>
3/25/2022 Payment - Thank You		(\$45,000.00)
<b>Total payments and adjustments</b>		<b>(\$45,000.00)</b>
<b>Balance due</b>		<b>\$227,961.50</b>

Timekeeper Summary			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen Rakusin	102.57	480.00	\$49,233.60

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

May 2, 2022

gina@harbisonlumber.com  
Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:

Enclosed please find my bill for services rendered in the above styled case for the period of April 1, 2022 through April 30, 2022.

The total amount due for fees is \$30,475.20. The total amount due for costs this billing period is \$1,829.20. The total amount due for fees and costs this billing period is **\$32,304.40**. You had a previous balance in the amount of \$227,961.50. Payments were received in the amount of \$0.00.

**The total amount now due is \$260,265.90.**

Payment is now due. Your prompt payment of these items will be greatly appreciated.

Sincerely,

  
Stephen Rakusin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

Credit Card # \_\_\_\_\_ Exp. Date / CVV Code: \_\_\_\_\_

Remit payment to:

SIGNATURE \_\_\_\_\_ (AS IT APPEARS ON THE CARD)

Litigation Lawyers,  
Professional Association  
2881 East Oakland Park Blvd., Suite 434  
Ft. Lauderdale, FL 33306

PRINT NAME \_\_\_\_\_ (AS IT APPEARS ON THE CARD)

DAYTIME PHONE \_\_\_\_\_

**LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harblson v. Patriots Bank

May 02, 2022

File # 3062.1

Invoice # 24553

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
4/1/2022 SBR	Prepared email to Eric Peterson, Esquire and Chris Redmond, Esquire (.08) Prepared fee objections (.08) Conferred with Chris Harblson (.08) Conferred with Spencer Desai (.17) Conferred with Chris Harblson (.17)	0.58 480.00/hr	278.40
SBR	Researched case law (venue change/judge change) Prepared memo to file (2.25) Call to Joe Jacobson (.08) Reviewed email from Patrick Bousquet (.08)	2.42 480.00/hr	1,161.60
4/2/2022 SBR	Reviewed court order (.08) Conferred with Chris Harblson (twice) (.83) Conferred with Rae Mosier (.17) (.17 NO CHARGE)	0.83 480.00/hr	398.40
4/3/2022 SBR	Conferred with Chris Harblson (twice) (.33) Conferred with Rae Mosier (several times) (.58) Conferred with Spencer Desai (.50) (.33 NO CHARGE)	1.08 480.00/hr	518.40
4/4/2022 SBR	Conferred with Rae Mosier (.08) Call to Gretchen Garrison (.08) Conferred with appellate lawyer Patrick Bousquet and prepared email to Patrick Bousquet (.50) Conferred with Chris Harblson (.08) Call to Josh Reeves Jr (appellate lawyer) (.08) Call to Joe Jacobson (appellate lawyer) (.08) Conferred with Michael Gross (appellate lawyer) (.08) Conferred with Mitch Jacobs (appellate lawyer) (.08) Conferred with Gina Harblson, Mike Silvey and Rae Mosier (.83) Researched receiver venue statute (.42) (.08 NO CHARGE)	2.25 480.00/hr	1,080.00
4/5/2022 SBR	Conferred with Rae Mosier and Brian Valentine (three times) (.33) Conferred with Gretchen Garrison (.58) Conferred with Chris Harblson (.08) Prepared email to Gretchen Garrison (.08) Conferred with Joe Jacobson (.58) Prepared email to Joe Jacobson (.08) Conferred with Gretchen Garrison (.25) Conferred with Gina	1.92 480.00/hr	921.60

(954) 356-0496

Harblson v. Patriots Bank  
 Invoice # 24553

		<u>Hrs/Rate</u>	<u>Amount</u>
	Harblson, Rae Mosier and Mike Silvey (.33) (.33 NO CHARGE)		
4/6/2022 SBR	Prepared appeal materials (.17) Call to Tom Weaver (appellate attorney) (.08) Reviewed Gina Harblson email and order of dismissal of GSB Investing (.08) Conferred with Jeff McPherson (appellate lawyer) (.58) Prepared email to Jeff McPherson (.08) Prepared appeal materials (.17) Reviewed email from Julian Kuszmaul (.08) Researched case law (change of venue/change of Judge) (1.00) Conferred with Gina Harblson and Mike Silvey (.33)	2.58 480.00/hr	1,238.40
4/7/2022 SBR	Conferred with Rae Mosier (.17) Conferred with Rae Mosier and Gina Harblson (.25) Call to Patrick Bousquet (.08) Prepared email to Patrick Bousquet (.08) Conferred with Gretchen Garrison, Esquire (.08) Prepared appellate notebook materials (.58) Call to Patrick Bousquet (.08) Conferred with Patrick Bousquet (.08) Conferred with Rae Mosier (.17) Conferred with Gina Harblson (.08) Conferred with Tom Weaver (.17) Conferred with Mike Silvey (.17) Conferred with Gina Harblson (.08) Conferred with Rae Mosier (twice) (.25) Conferred with Spencer Desai (.67) (.58 NO CHARGE)	2.75 480.00/hr	1,320.00
4/8/2022 SBR	Conferred with Patrick Bousquet (.08) Prepared appellate materials (1.67) Conferred with Rae Mosier (.08) Conferred with Gina Harblson (.08) Reviewed court order in Mineral Fork Ranch case (.08) Reviewed Julian Kuszmaul email on GSB Investing and Motion to Set Aside Dismissal (.17) (.08 NO CHARGE)	2.00 480.00/hr	960.00
4/9/2022 SBR	Reviewed materials from Patrick Bousquet (notice of appeal; jurisdictional statement) (.33) Conferred with Patrick Bousquet (.08)	0.42 480.00/hr	201.60
4/10/2022 SBR	Prepared materials for jurisdictional statement for Missouri Supreme Court (1.50) Reviewed Gina Harblson email (.08) Email and call to Patrick Bousquet (.08) Call to Chris Harblson (.08) Conferred with Gina Harblson (.42) Conferred with Chris Harblson (.08)	2.25 480.00/hr	1,080.00
4/12/2022 SBR	Prepared memo of law; Researched case law (Receiver's Motion to Strike/Motion to Change Judge/Venue) (2.50) Conferred with Rae Mosier (.17) Conferred with Gina Harblson (.08)	2.58 480.00/hr	1,238.40
4/13/2022 SBR	Call to Mike Silvey (.08) Prepared memo of law; Prepared Opposition to Motion to Change Venue) and Motion to Strike (Receiver) (1.67) Conferred with Mike Silvey (twice) (.25)	2.00 480.00/hr	960.00

Harbison v. Patriots Bank  
 Invoice # 24553

		<u>Hrs/Rate</u>	<u>Amount</u>
4/14/2022	SBR Researched case law; Prepared memo of law (receiver stay/strike and claim issues) (1.42)	1.42 480.00/hr	681.60
4/15/2022	SBR Reviewed 2 Spencer Desai emails (.17) Reviewed proposed order on Motion to Borrow (.08)	0.25 480.00/hr	120.00
4/18/2022	SBR Call to and text to Patrick Bousquet (.08) Conferred with Chris Harbison (.08)	0.17 480.00/hr	81.60
4/19/2022	SBR Conferred with Patrick Bousquet (.08)	0.08 480.00/hr	38.40
4/20/2022	SBR Conferred with Chris Harbison (.17)	0.17 480.00/hr	81.60
4/21/2022	SBR Conferred with Rae Mosler (twice) (.17) Reviewed notice of conference call (for 4/25/22) and notice of hearing on Coopers Motion to Dismiss (.17) Reviewed 2 emails from Mike Silvey and 5 requests for transcripts (for appeal) (.33) (.17 NO CHARGE)	0.50 480.00/hr	240.00
4/22/2022	SBR Prepared objection to the proposed order on the Motion to Borrow; Reviewed Nick Zluticky letter to judge in federal case (.08) Conferred with Rae Mosler (.17) Conferred with Mike Silvey (.17) Prepared opposition to Coopers' Motion for Change of Venue (.50) Conferred with Rae Mosler and Gina Harbison (.25) Prepared opposition to Motion to Strike (Receiver) (2.83) Reviewed Gina Harbison email (.08) (.17 NO CHARGE)	5.33 480.00/hr	2,558.40
4/23/2022	SBR Prepared Motion to Discharge/Remove/Terminate Receiver (3.50) Prepared answer and affirmative defenses to Mineral Fork Ranch complaint (4.33)	7.83 480.00/hr	3,758.40
4/24/2022	SBR Conferred with Chris Harbison (.17) Conferred with Gina Harbison (.33) Prepared answer and affirmative defenses (Mineral Fork Ranch) (.17) Prepared response to Motion for Order to Show Cause (Quickbooks) (1.17) Prepared motion to remove receiver and researched case law (2.08) Call to Spencer Desai (.08) Conferred with Rae Mosler (.25) (.25 NO CHARGE)	4.00 480.00/hr	1,920.00
4/25/2022	SBR Prepared response to motion for order to show cause (.42) Prepared motion to remove, terminate or discharge Receiver (6.17) Call to Mike Silvey (.08) Reviewed Gina Harbison emails and prepared answer and affirmative defenses to Mineral Fork Ranch case (.76) Conferred with Mike Silvey (.08) Conferred with Spencer Desai (twice) (.33) Conferred with Rae Mosler (.08) (.08 NO CHARGE)	7.83 480.00/hr	3,758.40



Harblison v. Patriots Bank  
 Invoice # 24553

		<u>Hrs/Rate</u>	<u>Amount</u>
4/26/2022	SBR Reviewed Spener Desai email (.08) Prepared objection to stay (3.50) Prepared answer and affirmative defense (Mineral Fork Ranch) (.50) Prepared objection to hiring of auctioneer for personal property (.50) Conferred with Chris Harblison (.08) Prepared responses to 4 Cooper Motions to Dismiss (.50) Conferred with Mike Silvey (.08)	5.25 480.00/hr	2,520.00
4/27/2022	SBR Prepared memorandum of law responses to 4 Cooper Motions to Dismiss (1.33) Reviewed Nick Zluticky email (.08) Prepared email to Mike Silvey (.08) Conferred with Mike Silvey (.42)	1.92 480.00/hr	921.60
4/28/2022	SBR Prepared for upcoming hearing (2.33) Conferred with Mike Silvey (.17) Attended telephonic hearing (.67) Conferred with Mike Silvey (.17) Call to Rae Mosier (.08) Conferred with Gina Harblison (.17) Conferred with Spencer Desai (.25) Conferred with Rae Mosier (twice) (.33) Reviewed email from Shawn Elbaz of Cook BBQ Products (.08) (.42 NO CHARGE)	3.83 480.00/hr	1,838.40
4/29/2022	SBR Conferred with Mike Silvey (.08) Conferred with Chris Harblison and Mike Silvey (.33) Conferred with Spencer Desai (.17) Conferred with Rae Mosier (.08) Reviewed court order (.08) Conferred with Gina Harblison and Chris Harblison (.17) (.08 NO CHARGE)	0.83 480.00/hr	398.40
4/30/2022	SBR Reviewed email from Patrick Bousquet and Respondent's suggestions in Opposition to Appellant's Rule 81.08 jurisdictional statement (.17) Reviewed subpoena to Investors Title and Pinnacle Title in Mineral Fork Ranch case; Prepared memo to file (.25)	0.42 480.00/hr	201.60
<b>For professional services rendered</b>		<b>63.49</b>	<b>\$30,475.20</b>

Additional Charges:

	<u>Qty/Price</u>	
4/5/2022 Cash Gill - Transcript Copy - taken 11/11/2021 (was not added to prior billing)	1 661.90	661.90
Adam David Pelpke - Transcript copy - taken 10/30/2021 (was not added to prior billing)	1 695.10	695.10
4/19/2022 Scans	240 0.20	48.00
Photocopies	2,121 0.20	424.20



Harblson v. Patriots Bank  
Invoice # 24553

	<u>Amount</u>
Total costs	\$1,829.20

	<u>Amount</u>
For professional services rendered	63.49 \$32,304.40

Total amount of this bill	\$32,304.40
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Previous balance	\$227,961.50
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Balance due	\$260,265.90
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Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen Rakusln	63.49	480.00	\$30,475.20

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

June 3, 2022

gina@harbisonlumber.com  
Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:

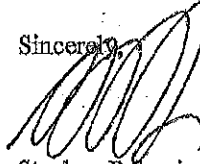
Enclosed please find my bill for services rendered in the above styled case for the period of May 1, 2022 through May 31, 2022.

The total amount due for fees is \$24,364.80. The total amount due for costs this billing period is \$108.80. The total amount due for fees and costs this billing period is \$24,473.60. You had a previous balance in the amount of \$260,265.90. Payments were received in the amount of \$0.00.

**The total amount now due is \$284,739.50.**

Payment is now due. Your prompt payment of these items will be greatly appreciated.

Sincerely,



Stephen Rakusin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

Credit Card # \_\_\_\_\_ Exp. Date / CVV Code: \_\_\_\_\_

Remit payment to:

SIGNATURE \_\_\_\_\_ (AS IT APPEARS ON THE CARD)

Litigation Lawyers,  
Professional Association  
2881 East Oakland Park Blvd., Suite 434  
Ft. Lauderdale, FL 33306

PRINT NAME \_\_\_\_\_ (AS IT APPEARS ON THE CARD)

DAYTIME PHONE \_\_\_\_\_

LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harblson v. Patriots Bank

June 03, 2022

File # 3062.1

Invoice # 24555

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
5/2/2022	SBR Conferred with Chris Harblson (.25) Reviewed Gina Harblson email (.08) Conferred with Gina Harblson (several times) (1.00) Reviewed Hinkle Law Firm mail receipt request (.08)	1.42 480.00/hr	681.60
5/3/2022	SBR Conferred with Chris Harblson (.08) Conferred with Rae Mosier, Gina Harblson and Chris Harblson (several times) (1.00) Prepared demand letters; Reviewed materials from Gina Harblson on 2007 Doosan Wheel Loader and John Deere Wheel Loader (1.00) Conferred with Rae Mosier (.17) Conferred with Chris Harblson (.08) Call to Spencer Desai (.08) Prepared email to Gina Harblson; Reviewed email from Gina Harblson (.17) Prepared 2 letters to Nick Zluticky on the Harblson Lumber Co., LLC Doosan Wheel Loader and the John Deere Loader (1.92) Conferred with Spencer Desai (.17) Conferred with Gina Harblson; Reviewed Gina Harblson email (.08) (.17 NO CHARGE)	4.92 480.00/hr	2,361.60
5/4/2022	SBR Conferred with Chris and Gina Harblson and Rae Mosier (.75) Reviewed 2 response letters from Nick Zluticky; Prepared memo to file (.33) Reviewed email from Gina Harblson and summons and complaint for Potosi Charcoal, LLC (.33) Reviewed email from Gina Harblson on Wheel Loaders (.08) Reviewed Gina Harblson email (potential CRAZ buyer) (.08)	1.58 480.00/hr	758.40
5/5/2022	SBR Conferred with Rae Mosier (.08) Conferred with Chris Harblson (.08) Conferred with Gina Harblson (.17) Call to Spencer Desai (.08)	0.42 480.00/hr	201.60
5/6/2022	SBR Conferred with Spencer Desai (.25) Conferred with Rae Mosier (.25) (.25 NO CHARGE)	0.25 480.00/hr	120.00

(954) 356-0496

Harblson v. Patriots Bank

Invoice # 24555

		<u>Hrs/Rate</u>	<u>Amount</u>
5/10/2022	SBR Conferred with Gina Harblson and Chris Harblson (.67) Call to Patrick Bousquet (.08)	0.75 480.00/hr	360.00
5/11/2022	SBR Reviewed email from Spencer Desai (.08)	0.08 480.00/hr	38.40
5/12/2022	SBR Conferred with Patrick Bousquet (.08)	0.08 480.00/hr	38.40
5/13/2022	SBR Call to Patrick Bousquet (.08) Conferred with Patrick Bousquet (.33) Conferred with Chris Harblson (.25)	0.67 480.00/hr	321.60
5/14/2022	SBR Conferred with Rae Mosler (.08) Reviewed Mineral Fork Ranch appraisal information from Gina Harblson (summary - subject parcel roster) on Mineral Fork Ranch (.17) (.08 NO CHARGE)	0.17 480.00/hr	81.60
5/15/2022	SBR Conferred with Chris Harblson (Black River Motel) (.17)	0.17 480.00/hr	81.60
5/17/2022	SBR Reviewed Mike Silvey email and hearing notice (.08) Reviewed Spencer Desai email (.08) Call to Chris Harblson (.08) Conferred with Gina Harblson (.08) Prepared response and objection to Motion to Sell Black River Motel (1.83) Conferred with Gina Harblson (.17) Reviewed email from Gina Harblson (.08) Call to Chris Harblson (.08) Call to Spencer Desai (.08) Call to Mike Silvey (.08) Conferred with Mike Silvey (.25) Conferred with Chris Harblson (.17)	3.08 480.00/hr	1,478.40
5/18/2022	SBR Reviewed Patriots Bank Black River Motel suggestions (.08) Conferred with Rae Mosler (.08) Prepared objection to Motion to Sell Black River Motel (1.75) Reviewed email from Gina Harblson on Potosi Charcoal, LLC (.08) Reviewed 2 appraisals on 395 Stonebridge (GSB Investing Litigation) (.25) (.08 NO CHARGE)	2.17 480.00/hr	1,041.60
5/19/2022	SBR Prepared objection to Black River sale motion (.42) Call to Mike Silvey (.08) Conferred with Rae Mosler (.17) Conferred with Gina Harblson, Chris Harblson and Rae Mosler (1.08) Reviewed email from Gina Harblson (.08) Reviewed email from Gina Harblson with CHAB Development balance sheets (Mineral Fork Ranch) (.17) and 2017-2018 bank statements for GSB Investing (.17) (.17 NO CHARGE)	2.00 480.00/hr	960.00
5/20/2022	SBR Researched case law alter ego - Potosi Charcoal (1.92) Prepared Motion to Dismiss (Potosi Charcoal case) (.83) Prepared objection to five Receiver motions to approve fees (2.00) Researched possession case la; Prepared	8.92 480.00/hr	4,281.60

Harblson v. Patriots Bank  
 Invoice # 24555

		<u>Hrs/Rate</u>	<u>Amount</u>
	complaint for replevin, conversion - John Deere Wheel Loader and Doosan Wheel Loader (4.17)		
5/20/2022	SBR Reviewed Spencer Desai email and prepared email to Spencer Desai (.08) Prepared Motion to Dismiss Potosi Charcoal Petition (2.17) Reviewed Mike Silvey email and contract (.17) Reviewed opposition to Black River Sale Motion (.25) Conferred with Spencer Desai (.17) Conferred with Chris Harblson (.08) Researched alter ego case law for Potosi Charcoal (6.08)	9.00 480.00/hr	4,320.00
5/21/2022	SBR Reviewed Glan Harblson deposition testimony on Mineral Fork Ranch (.17) and deposition testimony on GSB Investing (.17) Reviewed Receiver's response to Motion for Removal, Termination and Discharge (.50) Researched case law (alter ego) (Potosi Charcoal) (.67)	1.83 480.00/hr	878.40
5/23/2022	SBR Prepared Motion to Dismiss on Potosi Charcoal (2.50) Prepared notice and objection to motions for approval of receiver fees (.42) Conferred with Leo Nelson (Leon Basler's attorney) (.25) Prepared replevin / conversion petition (Wheel Loader) (.33) Conferred with Mike Silvey (.25)	3.75 480.00/hr	1,800.00
5/24/2022	SBR Conferred with Chris Harblson (.17) Prepared petition for replevin and conversion (1.58)	1.75 480.00/hr	840.00
5/25/2022	SBR Conferred with Chris Harblson (.08) Reviewed Mike Silvey email (.08) Reviewed Spencer Desai email (.08)	0.25 480.00/hr	120.00
5/26/2022	SBR Reviewed appraisal in Potosi Charcoal case (.08) Reviewed Cooper answers to third party complaints (four complaints in main case) (.25) Prepared replevin and conversion complaint (2.17) Conferred with Chris Harblson (.08) Reviewed order to show cause (.08) Call to and conferred with Mike Silvey (.17) Call to Spencer Desai (.08)	2.92 480.00/hr	1,401.60
5/27/2022	SBR Reviewed Zluticky transcript excerpts on 3/29/22 hearing (Quickbooks - Motion for Protective Order) (.17) Conferred with Rae Mosier (.17) Conferred with Chris Harblson (.08) Prepared replevin conversion prima facie tort action (1.42) Conferred with Mike Silvey (.08) Conferred with Spencer Desai on order to show cause response (.08) Conferred with Gina Harblson (.08) Conferred with Chris Harblson (comps) (.17) (.17 NO CHARGE)	2.08 480.00/hr	998.40
5/31/2022	SBR Conferred with (conference call) Chris Harblson, Gina Harblson, Spencer Desai and Mike Silvey (change of judge / motion hearing issues) (.83) Conferred with Chris Harblson (.08) Conferred with Spencer Desai (twice) (.17) Reviewed Spencer Desai email to Judge and	2.50 480.00/hr	1,200.00

Harbison v. Patriots Bank  
Invoice # 24555

	<u>Hrs/Rate</u>	<u>Amount</u>
response from Court (.08) Researched change of Judge case law (1.25) Reviewed Gina Harbison email (.08)		

<b>For professional services rendered</b>	<b>50.76</b>	<b>\$24,364.80</b>
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Additional Charges :

	<u>Qty/Price</u>	
5/24/2022 Scans	38	7.60
	0.20	
Photocopies	162	32.40
	0.20	
5/31/2022 Scans	126	25.20
	0.20	
Photocopies	218	43.60
	0.20	

<b>Total costs</b>		<b>\$108.80</b>
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<b>For professional services rendered</b>	<b>50.76</b>	<b>\$24,473.60</b>
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<b>Total amount of this bill</b>		<b>\$24,473.60</b>
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<b>Previous balance</b>		<b>\$260,265.90</b>
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<b>Balance due</b>		<b>\$284,739.50</b>
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Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen Rakusin	50.76	480.00	\$24,364.80

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

July 5, 2022

gina@harbisonlumber.com  
Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:

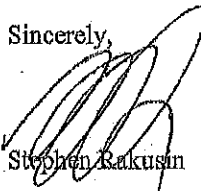
Enclosed please find my bill for services rendered in the above styled case for the period of June 1, 2022 through June 30, 2022.

The total amount due for fees is \$37,924.80. The total amount due for costs this billing period is \$354.20. The total amount due for fees and costs this billing period is **\$38,279.00**. You had a previous balance in the amount of \$284,739.50. Payments were received in the amount of \$80,000.00.

**The total amount now due is \$243,018.50.**

Payment is now due. Your prompt payment of these items will be greatly appreciated.

Sincerely,



Stephen Rakusin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

Credit Card # \_\_\_\_\_ Exp. Date / CVV Code: \_\_\_\_\_

Remit payment to:

SIGNATURE (AS IT APPEARS ON THE CARD)

PRINT NAME (AS IT APPEARS ON THE CARD)

Litigation Lawyers,  
Professional Association  
2881 East Oakland Park Blvd., Suite 434  
Ft. Lauderdale, FL 33306

DAYTIME PHONE \_\_\_\_\_

**LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harblson v. Patriots Bank

July 05, 2022

File # 3062.1

Invoice # 24561

**Professional Services**

		<u>Hrs/Rate</u>	<u>Amount</u>
6/1/2022	SBR Prepared for and attended hearing (Judge disqualified) (.75) Conferred with Spencer Desai (.08) Conferred with Chris Harblson and Gina Harblson (.17) Conferred with Bill Biermann (Business Broker) (Black River Motel) (.58)	1.58 480.00/hr	758.40
6/2/2022	SBR Reviewed letter from Blue Hog attorney in Potosi Charcoal litigation (.08) Reviewed email from Bill Biermann (Business Brokers) on Black River Motel (.08)	0.17 480.00/hr	81.60
6/3/2022	SBR Conferred with Gina Harblson (.08) Call to Mike Silvey (.08) Conferred with Mike Silvey (on main case and Mineral Fork Motion to Compel) (.25) Conferred with Chris Harblson (.08) Conferred with Dan Billington (attorney for Blue Hog in Potosi Charcoal case) (.17) Reviewed materials from Bill Biermann (.25) Conferred with Bill Biermann (twice) (Business Broker - Black River Motel) (.33) Conferred with Gina Harblson (.08) Reviewed Gina Harblson email (.08)	1.42 480.00/hr	681.60
6/4/2022	SBR Conferred with Rae Mosier (.25)	0.25 480.00/hr	NO CHARGE
6/5/2022	SBR Conferred with Chris Harblson (.17)	0.17 480.00/hr	81.60
6/6/2022	SBR Reviewed 2 Gina Harblson emails (.17) Conferred with Chris Harblson (twice) (.17) Reviewed Judge Brenda Stacey Info (.08) Conferred with Mike McDorman on GSB Investing case (Reviewed Fraud Transfer case law) (.83) Conferred with Chris Harblson (.08) Reviewed value on wheel loaders (Harblson Lumber Co., LLC) (.08)	1.42 480.00/hr	681.60

(954) 356-0496



Harbison v. Patriots Bank  
Invoice # 24561

		<u>Hrs/Rate</u>	<u>Amount</u>
6/7/2022	SBR Conferred with Chris Harbison (.08) Conferred with Mike Silvey (on main case and Harbison Lumber Co. Replevin) (.33)	0.42 480.00/hr	201.60
6/8/2022	SBR Prepared Replevin, complaint and affidavit revisions for Harbison Lumber; Conferred with Gina Harbison (on wheeler loader - Harbison Lumber (.58) Call to Gregory Groves (Cooper Counsel in main case) (.08)	0.67 480.00/hr	321.60
6/9/2022	SBR Reviewed Mike Silvey email (.08) Conferred with Mike Silvey, Spencer Desai, Gina Harbison and Chris Harbison on wheel loader suit for Harbison Lumber (.75) Prepared Verification (.17)	1.00 480.00/hr	480.00
6/13/2022	SBR Conferred with Chris Harbison (.08)	0.08 480.00/hr	38.40
6/14/2022	SBR Reviewed 3 Gina Harbison emails (.25) Reviewed Zack Hemenway email to Mike Silvey (on Mineral Fork Ranch) (.17)	0.42 480.00/hr	201.60
6/15/2022	SBR Reviewed administrative dissolution for Jonesburg (.08)	0.08 480.00/hr	38.40
6/16/2022	SBR Call to Chris Harbison (.08) Prepared email to Gina Harbison (.08)	0.17 480.00/hr	81.60
6/17/2022	SBR Conferred with Gina Harbison (.08) Call to Spencer Desai (.08) Reviewed Notice of Trustee's Sale (Black River Motel) (.08) Conferred with Spencer Desai (.17)	0.42 480.00/hr	201.60
6/18/2022	SBR Reviewed Gina Harbison email on Black River Motel checks (.08)	0.08 480.00/hr	38.40
6/19/2022	SBR Prepared materials for Motion for Summary Judgment for Mineral Fork Ranch and GSB Investing cases (1.25)	1.25 480.00/hr	600.00
6/20/2022	SBR Prepared materials for Motion for Summary Judgment (Mineral Fork Ranch / GSB Investing); Researched case law (fraud transfer and alter ego) (1.17) (Mineral Fork Ranch, GSB Investing and Potosi Charcoal (.92) Researched fraudulent transfer case law and Fraud Transfer Statutes (1.58)	3.67 480.00/hr	1,761.60
6/21/2022	SBR Conferred with Chris Harbison (.17) Prepared email to Spencer Desai (.08) Prepared Motion for Summary Judgment (Mineral Fork Ranch) (.25)	0.50 480.00/hr	240.00
6/22/2022	SBR Prepared petition for injunction on Black River Motel (6.42) Conferred with Chris Harbison (.08) Conferred with Rae Mosler (1.00) Researched injunction case law (2.50) (1.00 NO CHARGE)	9:00 480.00/hr	4,320.00

Harblson v. Patriots Bank

Invoice # 24561

		Hrs/Rate	Amount
6/23/2022	SBR	9.08 480.00/hr	4,358.40
	Conferred with Chris Harblson and Gina Harblson (.08) Prepared for Injunction (Black River, CRAZ and Jonesburg) (6.75) Conferred with Gina Harblson (.17) Reviewed SMF Registered Services and Stinson records (.25) Conferred with Gina Harblson (.17) Reviewed Spencer Desai email (.08) Researched Injunction case law (1.42) Call to Spencer Desai (.08) Prepared email to Rae Mosler (.08) Reviewed email from Gina Harblson (.08) (.08 NO CHARGE)		
6/24/2022	SBR	7.58 480.00/hr	3,638.40
	Prepared petition for injunction (Black River, CRAZ and Jonesburg) (6.25) Call and email to Spencer Desai (.08) Conferred with Spencer Desai (.67) Conferred with Gina Harblson (.17) Reviewed CRAZ Investments Notice of Publication (.08) Call to Spencer Desai (.08) Call to Mike Silvey (.08) Conferred with Rae Mosler (.08) Conferred with Gina Harblson (.08) (.08 NO CHARGE)		
6/26/2022	SBR	4.08 480.00/hr	1,958.40
	Researched case law (Injunction and sale) (4.08)		
6/27/2022	SBR	7.92 480.00/hr	3,801.60
	Prepared Injunction Petitions; CRAZ; Black River; Researched case law (6.42) Conference call with Mike Silvey, Spencer Desai and Gina Harblson (1.50) Conferred with Rae Mosler (.17) (.17 NO CHARGE)		
6/28/2022	SBR	13.25 480.00/hr	6,360.00
	Researched case law; Prepared Injunction Petitions (Jonesburg, CRAZ, Black River) (12.33) Conferred with Mike Silvey (.17) Conferred with Spencer Desai (.17) Conferred with Chris Harblson (.08) Conferred with Gina Harblson (.17) Call to Spencer Desai (.08) Researched case law; Reviewed Gina Harblson email and Jonesburg Sale Notice and Appointment of Successor Trustee (.17) Reviewed bonding emails (.08)		
6/29/2022	SBR	6.58 480.00/hr	3,158.40
	Prepared Motion to Stay Sales (Jefferson County) (non judicial) (5.67) Conferred with Rae Mosler (twice) (.83) Conferred with Rae Mosler and Mike Silvey (.58) Call to Spencer Desai; Conferred with Rae Mosler (twice) (.25) Conferred with Spencer Desai (.33) (1.08 NO CHARGE)		
6/30/2022	SBR	8.00 480.00/hr	3,840.00
	Prepared proposed Orders on TRO; Prepared Emergency Motion Order; Prepared 3 applications for TRO and Injunctive Relief; Prepared various letters (six) to Michael Pappas, Esquire (for claimants and for designations with Sales); Prepared 2 emails to Michael Pappas; Call to Mike Silvey (.08) Conferred with Rae Mosler (.17) Conferred with Spencer Desai (.08) Conferred with Gina Harblson (.08) Reviewed 2 Nick		

Harblson v. Patriots Bank  
Invoice # 24561

	<u>Hrs/Rate</u>	<u>Amount</u>
Zluticky emails (.17) (.17 NO CHARGE)		
For professional services rendered	79.26	\$37,924.80
Additional Charges :		
	<u>Qty/Price</u>	
6/29/2022 Scans	56 0.20	11.20
Photocopies	1,715 0.20	343.00
Total costs		\$354.20
For professional services rendered	79.26	\$38,279.00
Total amount of this bill		\$38,279.00
Previous balance		\$284,739.50
6/30/2022 Payment - Thank You		(\$80,000.00)
Total payments and adjustments		(\$80,000.00)
Balance due		\$243,018.50

Timekeeper Summary		
<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Stephen Rakusin	79.01	480.00
		\$37,924.80

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**  
2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

August 5, 2022

gina@harbisonlumber.com  
Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:

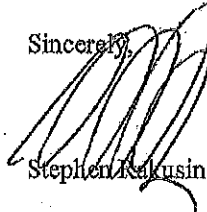
Enclosed please find my bill for services rendered in the above styled case for the period of July 1, 2022 through July 31, 2022.

The total amount due for fees is \$66,715.20. The total amount due for costs this billing period is \$629.20. The total amount due for fees and costs this billing period is \$67,344.40. You had a previous balance in the amount of \$243,018.50. Payments were received in the amount of \$80,000.00.

**The total amount now due is \$230,362.90.**

Payment is now due. Your prompt payment of these items will be greatly appreciated.

Sincerely,



Stephen Rakusin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

Credit Card # \_\_\_\_\_ Exp. Date / CVV Code: \_\_\_\_\_

Remit payment to:

SIGNATURE \_\_\_\_\_ (AS IT APPEARS ON THE CARD)

Litigation Lawyers,  
Professional Association  
2881 East Oakland Park Blvd., Suite 434  
Ft. Lauderdale, FL 33306

PRINT NAME \_\_\_\_\_ (AS IT APPEARS ON THE CARD)

DAYTIME PHONE \_\_\_\_\_

LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harbison v. Patriots Bank

August 05, 2022

File # 3062.1

Invoice # 24566

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
7/1/2022 SBR Researched Chapter 443 (.25) Prepared email to Mike Pappas and Nick Zluticky (.08) Conferred with Mike Silvey and Gina Harbison (.25) Prepared email to Mike Silvey (.08) Conferred with Rae Mosler (twice) (.42) Conferred with Gina Harbison (.08) Conferred with Rae Mosler (.50) Reviewed Nick Zluticky email (.08) Prepared letter and email to Nick Zluticky (.17) Researched Injunction case law (.33) Conferred with Mike Silvey (.67) Numerous calls with Mike Silvey and Gina Harbison (1.17) Reviewed Spencer Desal email (.08) Conferred with Rae Mosler (.67) Researched case law and revised orders (.92) Conferred with Rae Mosler (twice) (.17) (1.75 NO CHARGE)	3.33 480.00/hr	1,598.40
7/2/2022 SBR Call to Gina Harbison (.08)	0.08 480.00/hr	38.40
7/5/2022 SBR Prepared email and text to Spencer Desal (.17) Conferred with Mike Silvey (.17) Conferred with Gina Harbison and Chris Harbison (.25) Reviewed Mike Silvey email (.08) Conferred with Mike Silvey (.17) Conferred with Rae Mosler (.17) Reviewed Bank's response in opposition to Black River (.50) Conferred with Brian Valentine (.08) Conferred with Gina Harbison (.08) Reviewed Bank responses in opposition to Black River Injunction and reviewed bank response in opposition to CRAZ Injunction; Researched case law (3.00) Conferred with Mike Becker and Mike Silvey; Conferred with Mike Becker; Conferred with Mike Silvey (several times) (.25) Conferred with Rae Mosler (.08) Conferred with Mike Becker (on Jonesburg sale) (.08) Conferred with Rae Mosler and Brian Valentine (.67) Conferred with Rae Mosler (.08) Prepared email to Nick Zluticky (on Jonesburg sale) (.08) Reviewed 2 Nick Zluticky emails	5.00 480.00/hr	2,400.00

(954) 356-0496

Harblison v. Patriots Bank

Invoice # 24566

		<u>Hrs/Rate</u>	<u>Amount</u>
	(.17) (1.08 NO CHARGE)		
7/6/2022 SBR	Prepared email to Mike Becker (Jonesburg) (.08) Conferred with Rae Mosler (twice) (.17) Conferred with Mike Becker (.08) Conferred with Mike Silvey (.08) Conferred with Mike Becker (.17) Conferred with Mike Silvey and Gina Harblison (.17) Conferred with Mike Becker; Prepared revised order (Jonesburg) (.25) Conferred with Rae Mosler (.17) Conferred with Gina Harblison (twice) (.33) Conferred with Rae Mosler (.25) Researched case law - injunction (.25) (.68 NO CHARGE)	1.83 480.00/hr	878.40
7/7/2022 SBR	Prepared materials for memo of law (injunction) (.17) Conferred with Gina Harblison (.08) Conferred with Mike Silvey (.25) Conferred with Gina Harblison, Chris Harblison, Rae Mosler and Brian Valentine (.42)	0.92 480.00/hr	441.60
7/8/2022 SBR	Call to Mike Becker (.08) Conferred with Gina Harblison (.08) Conferred with Mike Becker (.08) Conferred with Rae Mosler (.08) Prepared email to Mike Pappas, Nick Zluticky and Eric Peterson (.17) Conferred with Mike Silvey (twice) (.17) Conferred with Gina Harblison and Rae Mosler (.25) Conferred with Eric Peterson (.25) Prepared motion to extend stay (.75) and proposed order on motion to extend stay (Black River Motel TRO) (.08) Reviewed Nick Zluticky email (.08) (.08 NO CHARGE)	1.83 480.00/hr	878.40
7/9/2022 SBR	Reviewed Eric Peterson email (.08)	0.08 480.00/hr	38.40
7/10/2022 SBR	Call to Rae Mosler (.08)	0.08 480.00/hr	NO CHARGE
7/11/2022 SBR	Conferred with Chris Harblison (.17) Call to Gregg Groves (.08) Conferred with Gregg Groves (.17) Prepared letter to Gregg Groves (.17) Conferred with Rae Mosler (.17) Prepared 3 appearance applications (.25) Call to Gina Harblison (.08) Call to Chris Harblison (.08) Conferred with Eric Peterson (.08) Call to Mike Silvey (.08)	1.33 480.00/hr	638.40
7/12/2022 SBR	Reviewed hearing notice in GSB Investing case (.08) Prepared letter to Mike Pappas (cc: Nick Zluticky) demanding accounting (1.25) Conferred with Mike Silvey, Spencer Desai and Gina Harblison (1.00) Prepared letter to Mike Pappas (.50) Conferred with Mike Silvey (.08) Reviewed executed order (TRO) and hearing notice for Black River Motel (Reynolds Co.) (.17) Reviewed Deed of Release (.08) Reviewed	3.33 480.00/hr	1,598.40

Harblson v. Patriots Bank  
 Invoice # 24566

		<u>Hrs/Rate</u>	<u>Amount</u>
	Theresa Sapp (Legend Land Title) email (.08) Reviewed Gina Harblson email (.08)		
7/13/2022 SBR	Conferred with Leo Nelson (.08) Conferred with Chris Harblson (.17) Conferred with Leo Nelson (.42) Call to Spencer Desai (.08) Conferred with Julian Kuzsmaul (.25) Conferred with Gina Harblson (.17)	1.17 480.00/hr	561.60
7/14/2022 SBR	Reviewed Spencer Desai case law and email (.17) Conferred with Rae Mosier (.25) Prepared answers in guaranty case (.08) Conferred with Gina Harblson (.08) Conferred with Mike Silvey, Spencer Desai, Rae Mosier and Gina Harblson (.42) Call and email to Greggory Groves (.17) Reviewed Mike Silvey email (.08)	1.25 480.00/hr	600.00
7/15/2022 SBR	Prepared answer, affirmative defenses and counterclaim in federal guaranty action (7.42) Call to Mike Silvey (.08) Conferred with Mike Silvey (.17) Conferred with Rae Mosier (.25) Conferred with Spencer Desai (.08) Conferred with Gina Harblson (.25) Reviewed Patriots Bank motion to dismiss in CRAZ Injunction Petition (.08) (.25 NO CHARGE)	8.08 480.00/hr	3,878.40
7/16/2022 SBR	Prepared answer, affirmative defenses and counterclaim in federal guaranty action (5.08) Conferred with Gina Harblson (.17) Reviewed Gina Harblson email (on notes) (.08) Reviewed various emails from Gina Harblson on Patriots bond of directions and committees (.50) (.08 NO CHARGE)	5.92 480.00/hr	2,841.60
7/17/2022 SBR	Prepared answer, affirmative defenses and counterclaim in federal guaranty case (4.50) Conferred with Gina Harblson (.08) Reviewed email from Gina Harblson Cooper activity (.08) Reviewed injunction hearing notice (CRAZ) (.08)	4.75 480.00/hr	2,280.00
7/18/2022 SBR	Conferred with Gina Harblson (.58) Prepared answer, affirmative defenses and counterclaim to federal guaranty case (6.00) Researched guarantee case law (3.17) Conferred with Gina Harblson (.33) Reviewed Nick Zluticky email in Injunction cases (.08)	10.17 480.00/hr	4,881.60
7/19/2022 SBR	Reviewed email on theft at charcoal plant (.08) Prepared answer, affirmative defenses and counterclaim in federal guaranty case (7.25) Conferred with Chris Harblson (.08) Conferred with Rae Mosier and Brian Valentine (.33) Conferred with Gina Harblson (.17) Conferred with Mike Silvey (.08) Prepared memo of law in response to Bank's Emergency Setaside Motion (Jefferson County) (3.92) Reviewed order assigning new judge in CRAZ	11.75 480.00/hr	5,640.00



Harblson v. Patriots Bank  
 Invoice # 24566

		<u>Hrs/Rate</u>	<u>Amount</u>
	Injunction case (.08) Reviewed email and attachments from Gina Harblson for federal guaranty case (CHAB guaranty) (.17) (.33 NO CHARGE)		
7/20/2022	SBR Prepared answer, affirmative defenses and counterclaim / thrd party complaint (federal case) (7.58) Prepared response memo in receivership case to emergency motion to set aside (.83) Call to Spencer Desai (.08) Conferred with Mike Silvey (.17) Conferred with Spencer Desai (twice) (.25) Conferred with Rae Mosler (.08) Conferred with Gina Harblson (.08) Reviewed Nick Zluticky email on Injunction case (.08) Reviewed Gregory Groves email - state court Cooper deposition (.08) Reviewed order setting Rule 16 conference in federal court (.17) (.08 NO CHARGE)	9.33 480.00/hr	4,478.40
7/21/2022	SBR Prepared answer, affirmative defenses and counterclaim (federal guaranty case) (8.92) Conferred with Rae Mosler and Brian Valentine (.17) Conferred with Gina Harblson (.08) Conferred with Rae Mosler (.08) Call to Spencer Desai (.08) Reviewed order dismissing Jonesburg Injunction Petition (.08) (.25 NO CHARGE)	9.00 480.00/hr	4,320.00
7/22/2022	SBR Prepared answer, affirmative defenses and counterclaim (federal guaranty case) (11.75) Conferred with Patrick Bousquet (on appeal) (.50) Call to Spencer Desai (.08) Conferred with Rae Mosler (.08) Conferred with Spencer Desai (.17) Call to Gina Harblson (.08) Conferred with Rae Mosler (.25) Conferred with Spencer Desai (.08) Reviewed Gregory Groves email on Cooper deposition (state court) Reviewed Spencer Desai 2 emails (.17) (.33 NO CHARGE)	12.92 480.00/hr	6,201.60
7/23/2022	SBR Reviewed Gina Harblson deposition excerpt for Basler (72 Cessna) and prepared email to Leo Nelson (Basler plane sale) (.42) Reviewed Spencer Desai email on federal court proposed joint scheduling plan (.17) Prepared materials for initial Appellant's brief (1.92)	2.50 480.00/hr	1,200.00
7/24/2022	SBR Prepared appellate brief materials (8.00)	8.00 480.00/hr	3,840.00
7/25/2022	SBR Call to Chris Harblson and Gina Harblson (.08) Prepared appellate brief materials - motion to vacate (3.75) Conferred with Gina Harblson and Chris Harblson (.50) Conferred with Rae Mosler (.08) Reviewed new Judge assignment in Black River Motel Injunction petition (.08) Reviewed Mike Silvey email	4.00 480.00/hr	1,920.00



Harbison v. Patriots Bank  
 Invoice # 24566

		<u>Hrs/Rate</u>	<u>Amount</u>
	(.08) (.58 NO CHARGE)		
7/26/2022	SBR Conferred with Chris Harbison (.08) Reviewed order on attorney withdrawal in Black River case (.08) Conferred with Rae Mosier (.17)	0.08 480.00/hr	NO CHARGE
7/27/2022	SBR Call to Mike Silvey (twice) (.17) Conferred with Glna Harbison (.08) Conferred with Rae Mosier (.08) Reviewed hearing notice for Jonesburg injunction case (.08) (.08 NO CHARGE)	0.33 480.00/hr	158.40
7/28/2022	SBR Conferred with Rae Mosier (.42) Prepared appellate materials; Researched case law (.17) Prepared Motion for Summary Judgment - Mineral Fork Ranch (4.50) (.42 NO CHARGE)	4.67 480.00/hr	2,241.60
7/29/2022	SBR Prepared Motion for Summary Judgment - Mineral Fork Ranch and GSB Investing; Researched fraudulent transfer case law (7.83) Conferred with Chris Harbison (.08) Conferred with Rae Mosier (.08) (.08 NO CHARGE)	7.92 480.00/hr	3,801.60
7/30/2022	SBR Prepared Motion for Summary Judgment - Mineral Fork Ranch and GSB Investing; Researched case law on fraudulent transfer (9.58)	9.58 480.00/hr	4,598.40
7/31/2022	SBR Researched fraud transfer case law; Prepared Motion for Summary Judgment - GSB Investing and Mineral Fork Ranch (9.92) Conferred with Rae Mosier (.08) (.08 NO CHARGE)	9.92 480.00/hr	4,761.60

For professional services rendered

139.15 \$66,715.20

Additional Charges :

	<u>Qty/Price</u>	
7/1/2022 Accounting Fees - Stinson CRAZ Investments, LLC Black River Motel, LLC Jonesburg Sawmill & Pallet Co., Inc.	1 75.00	75.00
7/31/2022 Scans	479 0.20	95.80
Photocopies	2,292 0.20	458.40
Total costs		\$629.20

Harbison v. Patriots Bank  
 Invoice # 24566

		<u>Amount</u>
For professional services rendered	139.15	\$67,344.40
Total amount of this bill		\$67,344.40
Previous balance		\$243,018.50
7/13/2022 Payment - Thank You		(\$80,000.00)
Total payments and adjustments		(\$80,000.00)
Balance due		\$230,362.90

Timekeeper Summary			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen Rakusin	138.99	480.00	\$66,715.20

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

August 19, 2022

gina@harbisonlumber.com

Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:

Enclosed please find my bill for services rendered in the above styled case for the period of August 1, 2022 through August 15, 2022.

The total amount due for fees is \$53,966.40. The total amount due for costs this billing period is \$1,141.02. The total amount due for fees and costs this billing period is \$55,107.42. You had a previous balance in the amount of \$230,362.90. Payments were received in the amount of \$0.00.

**The total amount now due is \$285,470.32.**

Payment is now due. Your prompt payment of these items will be greatly appreciated.

Sincerely,



Stephen Rakusyn

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

Credit Card # \_\_\_\_\_ Exp. Date / CVV Code: \_\_\_\_\_

Remit payment to:

SIGNATURE (AS IT APPEARS ON THE CARD)

Litigation Lawyers,  
Professional Association  
2881 East Oakland Park Blvd., Suite 434  
Ft. Lauderdale, FL 33306

PRINT NAME (AS IT APPEARS ON THE CARD)

DAYTIME PHONE \_\_\_\_\_

**LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harblson v. Patriots Bank

August 19, 2022

File # 3062.1

Invoice # 24567

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
8/1/2022	SBR Prepared Motion for Summary Judgment for Mineral Fork Ranch and GSB Investing; Researched case law (4.83) Conferred with Gina Harblson (.58) Conferred with Rae Mosier (.08) 9.08 NO CHARGE)	5.42 480.00/hr	2,601.60
8/2/2022	SBR Conferred with Chris Harblson (.08) Reviewed Mike Silvey email with Jefferson Co. 8/23/22 hearing notice (.08)	0.17 480.00/hr	81.60
8/3/2022	SBR Prepared Motion for Summary Judgment - Mineral Fork Ranch / GSB Investing; Researched case law (9.00) Conferred with Gina Harblson (.67) Conferred with Rae Mosier (.17) (.17 NO CHARGE)	9.67 480.00/hr	4,641.60
8/4/2022	SBR Conferred with Gina Harblson (.08) Reviewed Gina Harblson email (Mineral Fork Ranch) (.08) Prepared email to Leo Nelson (Leon Basler lawyer) (.08) Prepared Motion for Summary Judgment for Mineral Fork Ranch; Researched case law (6.25) Conferred with Spencer Desai (1.00) Conferred with Gina Harblson (.58) Reviewed Spencer Desai email (.08) Reviewed Mike Pappas email with scheduling plan (federal) (.08) Reviewed Mike Silvey email (.08) (1.58 NO CHARGE)	6.75 480.00/hr	3,240.00
8/5/2022	SBR Prepared Motion for Summary Judgment for Mineral Fork Ranch / GSB Investing; Researched case law (7.08) Conferred with Spencer Desai, Mike Pappas and Nick Zluticky (.08) Conferred with Spencer Desai (.08) Conferred with Gina Harblson (.33)	7.58 480.00/hr	3,638.40
8/6/2022	SBR Conferred with Chris Harblson and Gina Harblson (.58) Prepared appellate brief materials (4.50) Reviewed official trial transcript; Call to Spencer Desai (.08)	5.17 480.00/hr	2,481.60

(954) 356-0496

Harblson v. Patriots Bank  
 Invoice # 24567

		<u>Hrs/Rate</u>	<u>Amount</u>
8/7/2022	SBR Reviewed trial transcript for appeal (official); Conferred with Chris Harblson (.08) Reviewed and annotated appellate transcript (official transcript) (5.75)	5.75 480.00/hr	2,760.00
8/8/2022	SBR Prepared Mineral Fork Ranch Motion for Summary Judgment (2.00) Conferred with Gina Harblson (.17) Reviewed trial transcripts for appeal (8.92) Conferred with Rae Mosler (.17) (.17 NO CHARGE)	11.08 480.00/hr	5,318.40
8/9/2022	SBR Prepared Motion for Summary Judgment - Mineral Fork Ranch / GSB (2.33) Conferred with Gina Harblson (.42) Reviewed transcripts; Prepared appeal brief materials (6.00) Reviewed CHAB Development loan review summary and Patriots Bank board meeting records (.25) Conferred with Gina Harblson (.08)	9.08 480.00/hr	4,358.40
8/10/2022	SBR Prepared appeal materials (7.25) Prepared Motion for Summary Judgment - Mineral Fork Ranch and GSB Investing (2.00) Call to Gina Harblson (.08) Conferred with Patrick Bousquet on appeal (.33) Call to Bianca Eden, Esquire (.08) Call to Gregory Groves (.08) Call to Julian Kuzmaul (.08) Call to Chris Harblson (.08) Conferred with Julian Kuzmaul (.25) Conferred with Nick Zluticky and Spencer Desai (federal case) (.25) Conferred with Spencer Desai (.17) Reviewed proposed stipulation (.08) Conferred with Gina Harblson (.25) Conferred with Bianca Eden, Esquire (.75) Conferred with Harblsons, Rae Mosler and pro vabate (.25) (.25 NO CHARGE)	11.83 480.00/hr	5,678.40
8/11/2022	SBR Prepared Motion for Summary Judgment - Mineral Fork Ranch / GSB (7.58) Prepared email to Spencer Desai (.08) Conferred with Spencer Desai (twice) (.25) Conferred with Gina Harblson (.25) Reviewed CHAB, Mineral Fork Ranch and GSB Investing numerous records (.83) Reviewed Eric Peterson email (.08) Reviewed Gina Harblson email (.08) Reviewed Nick Zluticky email (guaranty case) (.08) Reviewed Spencer Desai email (.08) Reviewed Nick Zluticky email to Court (guaranty) (.08) Reviewed order vacating scheduling conference (.08)	9.50 480.00/hr	4,560.00
8/12/2022	SBR Prepared Motion for Summary Judgment for GSB Investing; Researched case law (8.33) Conferred with Gina Harblson (multiple times) (.33) Conferred with Bianca Eden (.17) Conferred with Rae Mosler (.08) (.08 NO CHARGE)	8.67 480.00/hr	4,161.60
8/13/2022	SBR Prepared GSB Motion for Summary Judgment; Researched case law (SOL) (8.08) Conferred with Gina Harblson (multiple times) (.58)	8.67 480.00/hr	4,161.60

Harbison v. Patriots Bank  
 Invoice # 24567

	<u>Hrs/Rate</u>	<u>Amount</u>
8/14/2022 SBR Prepared GSB Investing Motion for Summary Judgment; Prepared affidavit for Gina Harbison; Reviewed GSB and CHAB records and CHAB January 2018 balance sheet (8.17)	8.17 480.00/hr	3,921.60
8/15/2022 SBR Reviewed Mike Silvey email and attachment - Mineral Fork Motion for Summary Judgment; Prepared exhibits for GSB and Mineral Fork and affidavits for both cases (4.33) Conferred with Julian Kuszmaul (GSB) (.17) Conferred with Mike Silvey (Mineral Fork Ranch) (.17) Conferred with Gina Harbison (.25)	4.92 480.00/hr	2,361.60
<b>For professional services rendered</b>	<b>112.43</b>	<b>\$53,966.40</b>

## Additional Charges :

	<u>Qty/Price</u>	
8/12/2022 Pro Hac Vice Fee	1 418.82	418.82
8/15/2022 Scans	92 0.20	18.40
Photocopies	3,519 0.20	703.80

**Total costs** **\$1,141.02**

**For professional services rendered** **112.43** **\$55,107.42**

**Total amount of this bill** **\$55,107.42**

**Previous balance** **\$230,362.90**

**Balance due** **\$285,470.32**

## Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen Rakusin	112.43	480.00	\$53,966.40

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

September 21, 2022

[gina@harbisonlumber.com](mailto:gina@harbisonlumber.com)

Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:

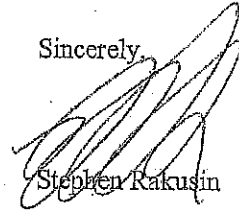
Enclosed please find my bill for services rendered in the above styled case for the period of August 15, 2022 through August 31, 2022.

The total amount due for fees is \$56,040.00. The total amount due for costs this billing period is \$1,921.80. The total amount due for fees and costs this billing period is \$57,961.80. You had a previous balance in the amount of \$285,470.32. Payments were received in the amount of \$0.00.

The total amount now due is \$343,432.12.

Payment is now due. Your prompt payment of these items will be greatly appreciated.

Sincerely,



Stephen Rakusin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

Credit Card # \_\_\_\_\_ Exp. Date / CVV Code: \_\_\_\_\_

Remit payment to:

SIGNATURE (AS IT APPEARS ON THE CARD)

PRINT NAME (AS IT APPEARS ON THE CARD)

DAYTIME PHONE \_\_\_\_\_

Litigation Lawyers,  
Professional Association  
2881 East Oakland Park Blvd., Suite 434  
Ft. Lauderdale, FL 33306

## LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harbison v. Patriots Bank

September 21, 2022

File # 3062.1

Invoice # 24568

## Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
8/16/2022 SBR	Reviewed Gina Harbison email with GSB revisions (.75) Call to Gina Harbison (.08) Prepared email to Gina Harbison (.08) Conferred with Gina Harbison (.08) Conferred with Chris Harbison (.08) Prepared affidavits for Gina Harbison and revised Motion for Summary Judgment and fact statements (GSB, Mineral Fork) (6.08)	7.17 480.00/hr	3,441.60
8/17/2022 SBR	Prepared affidavits and exhibits (GSB) (4.92) Prepared appeal transcript materials (2.50) Call to attorney (Public Defender - Hillsboro) (.08)	7.50 480.00/hr	3,600.00
8/18/2022 SBR	Prepared affidavit and exhibits for GSB, Mineral Fork Ranch, LLC (.75) Conferred with Gina Harbison (.17) Prepared response memorandum to Receiver's Motion for instructions (on auction sales) (7.42)	8.58 480.00/hr	4,118.40
8/19/2022 SBR	Reviewed email from Gina Harbison on Receiver's vin and property info (.08) Reviewed financial statements for GSB (.17) Conferred with Mike Silvey (.17) Conferred with Bianca Eden (twice) (.25) Conferred with Gina Harbison (.17) Prepared response to Receiver's request for instructions (on auction sales) (5.33)	6.17 480.00/hr	2,961.60
8/20/2022 SBR	Prepared affidavit and exhibits for GSB / Mineral Fork Ranch (3.92) Prepared materials for upcoming hearing (Jefferson Co.) (2.08)	6.00 480.00/hr	2,880.00
8/21/2022 SBR	Prepared affidavit and exhibits for GSB / Mineral Fork Ranch (4.00) Reviewed financial statements (1.50) Prepared for upcoming hearing in Jefferson County (3.00) Conferred with Gina Harbison (twice) (.17) Conferred with Rae Mosler (.17) Prepared proposed protective order on Quickbooks data base records (.50)	8.33 480.00/hr	3,998.40
8/22/2022 SBR	Prepared for upcoming hearing in Hillsboro / Jefferson Counties; Call to Spencer Desai (.08) Traveled to Festus (8.42) Prepared protective order and email to Nick	10.92 480.00/hr	5,241.60

(954) 356-0496



Harbison v. Patriots Bank

178

Invoice # 24568

		<u>Hrs/Rate</u>	<u>Amount</u>
	Zluticky; Prepared email to Eric Peterson (.50) Met with Gina Harbison and Chris Harbison (1.75) Conferred with Mike Silvey (several times) (.25) Conferred with Rae Mosler (.25) (.25 NO CHARGE)		
8/23/2022 SBR	Prepared for and attended hearing in Hillsboro / Jefferson County on Motion to Stay Auction Sales; Met with Mike Silvey and Gina Harbison (.67) Conferred with Rae Mosler (.33) Traveled to Washington University Law Library and researched case law (2.17) Prepared proposed order on hearing (.92) Prepared statement of uncontroverted facts (GSB Investing) Returned to Ft. Lauderdale (4.83) (.33 NO CHARGE)	14.92 480.00/hr	7,161.60
8/24/2022 SBR	Prepared proposed order (1.75) Prepared email to counsel, review proposed order of Patriots Bank (.25) Conferred with Bianca Eden (.17) Conferred with Chris Harbison (.08) Call to Mike Silvey (.08) Reviewed Gina Harbison email (.08) Conferred with Rae Mosier (twice) (.17) Call to Gina Harbison (.08) Call to Spencer Desai (.08) Conferred with Gina Harbison and Chris Harbison (.25) Conferred with Mike Silvey (.08) Reviewed Notice of Intent to Use Process Server (federal case) (.08) (.25 NO CHARGE)	3.17 480.00/hr	1,521.60
8/25/2022 SBR	Conferred with Chris Harbison (.33) Researched case law for appellate brief (motion to vacate) (3.08) Prepared statement of facts - GSB Motion for Summary Judgment (4.00) Conferred with Spencer Desai (federal case) (.25) Reviewed Gina Harbison email (.08)	7.75 480.00/hr	3,720.00
8/26/2022 SBR	Prepared Motion for Summary Judgment for GSB (with revisions) (6.92) Reviewed Mike Silvey email and demand letters from Receiver; Prepared email to Mike Silvey and Gina Harbison (.17)	7.08 480.00/hr	3,398.40
8/27/2022 SBR	Prepared appellate brief; Researched case law (2.33)	2.33 480.00/hr	1,118.40
8/28/2022 SBR	Prepared appellate brief; Researched case law (5.58)	5.58 480.00/hr	2,678.40
8/29/2022 SBR	Prepared appellate brief (7.50) Conferred with Mike McDorman (GSB) (.33) Conferred with Gina Harbison (.17) Reviewed notes received from Gina Harbison (GSB Motion for Summary Judgment) and bank Quickbooks records for CHAB Development (.67)	8.67 480.00/hr	4,161.60
8/30/2022 SBR	Prepared memo to file (.08) Conferred with Gina Harbison (twice) (.25) Researched appellate case law (.17) Prepared appellate findings of fact (5.83)	6.33 480.00/hr	3,038.40

Harbison v. Patriots Bank  
Invoice # 24568

	<u>Hrs/Rate</u>	<u>Amount</u>
8/31/2022 SBR Reviewed 2 Gina Harbison emails (.17) Prepared appellate brief (5.17) Conferred with Gina Harbison (twice) (.67) Conferred with Mike Silvey (.08) Call to Eric Peterson (.08) Call to Zach Fairlie (.08)	6.25 480.00/hr	3,000.00
<b>For professional services rendered</b>	<b>116.75</b>	<b>\$56,040.00</b>
Additional Charges :		
	<u>Qty/Price</u>	
8/22/2022 Hotel - Holiday Inn Express	1 147.34	147.34
Southwest Airlines - August 22-23, 2022	1 1,061.96	1,061.96
Meals - Subway	1 11.42	11.42
Meals - Ruby Tuesday	1 38.92	38.92
8/23/2022 Gas	1 22.00	22.00
Meals - Renaissance St. Louis	1 63.50	63.50
Avis	1 264.86	264.86
8/31/2022 Scans	534 0.20	106.80
Photocopies	1,025 0.20	205.00
<b>Total costs</b>		<b>\$1,921.80</b>
<b>For professional services rendered</b>	<b>116.75</b>	<b>\$57,961.80</b>
<b>Total amount of this bill</b>		<b>\$57,961.80</b>
<b>Previous balance</b>		<b>\$285,470.32</b>
<b>Balance due</b>		<b>\$343,432.12</b>

Harbison v. Patriots Bank

Invoice # 24568

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen Rakusin	116.75	480.00	\$56,040.00

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

October 4, 2022

gina@harbisonlumber.com

Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:


Enclosed please find my bill for services rendered in the above styled case for the period of September 1, 2022 through September 30, 2022.

The total amount due for fees is \$67,486.20. The total amount due for costs this billing period is \$1,438.63. The total amount due for fees and costs this billing period is **\$68,921.83**. You had a previous balance in the amount of \$343,432.12. Payments were received in the amount of \$0.00.

**The total amount now due is \$412,353.95.**

Payment is now due. Your prompt payment of these items will be greatly appreciated.

Sincerely,



Stephen Rakusin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

Credit Card # \_\_\_\_\_ Exp. Date / CVV Code: \_\_\_\_\_

Remit payment to:

SIGNATURE \_\_\_\_\_ (AS IT APPEARS ON THE CARD)

Litigation Lawyers,  
Professional Association  
2881 East Oakland Park Blvd., Suite 434  
Ft. Lauderdale, FL 33306

PRINT NAME \_\_\_\_\_ (AS IT APPEARS ON THE CARD)

DAYTIME PHONE \_\_\_\_\_

**LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harbison v. Patriots Bank

October 04, 2022

File # 3062.1

Invoice # 24574

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
9/1/2022 SBR Prepared appellate brief; Researched case law (3.33) Reviewed email from Bianca Eden (.08) Call to Bianca Eden (.08) Reviewed order to show cause (.08) Prepared letter to Eric Peterson and Zack Fairlie; Reviewed property records for wheel loaders, equipment and dump truck (2.17) Conferred with Bianca Eden (.08) Conferred with Gina Harbison (.17)	6.00 480.00/hr	2,880.00
9/2/2022 SBR Conferred with Mike Silvey (.08) Reviewed Gina Harbison email; Conferred with Chris Harbison (.08) Prepared letter to the Receiver with attachments (1.33) Prepared appellate brief; Researched case law (2.08) Conferred with Gina Harbison (twice) (.50) Conferred with Chris Harbison (twice) (.17) Call to Eric Peterson (.08) Conferred with Patrick Bousquet (appeal) (.17)	3.92 480.00/hr	1,881.60
9/3/2022 SBR Prepared appellate brief; Researched case law (5.67) Conferred with Gina Harbison (.08)	5.75 480.00/hr	2,760.00
9/4/2022 SBR Prepared appellate brief materials (.25) Researched case law (for appeal) (1.33)	1.58 480.00/hr	758.40
9/5/2022 SBR Reviewed Gina Harbison airplane records (for GSB) and notes (.58) Piper Lance / Piper Chieftain (for GSB and Mineral Fork Ranch) Call to Gina Harbison (.08) Prepared appellate brief (6.92)	7.58 480.00/hr	3,638.40
9/6/2022 SBR Conferred with Chris Harbison and Gina Harbison (.25) Prepared letter to Eric Peterson and Zack Fairlie on Receiver request for information (.17) Prepared appellate brief and researched case law (7.50) Conferred with Eric Peterson (.17) Conferred with Gina Harbison (.08) Conferred with Brian Valentine (.08) (.08 NO CHARGE)	8.17 480.00/hr	3,921.60

(954) 366-0496

Harbison v. Patriots Bank  
 Invoice # 24574

		<u>Hrs/Rate</u>	<u>Amount</u>
9/7/2022	SBR Prepared appellate brief (6.75) Conferred with Chris Harbison (.08) Reviewed order (main case) (.08) Conferred with Gina Harbison (twice) (.25) Prepared Motion for Summary Judgment Affidavit paragraphs (GSB Investing) (1.83) Prepared Motion for Summary Judgment affidavit - Mineral Fork Ranch (.67)	9.67 480.00/hr	4,641.60
9/8/2022	SBR Prepared memo of law on Motion for Summary Judgment - GSB Statement of Uncontroverted Facts and affidavit of Gina Harbison (4.25) Conferred with Gina Harbison (.08) Researched appeal of receivership sale ruling (.17) Conference call with Blanca Eden, Mike Silvey, Rae Mosier, Gina and Chris Harbison (.83) Prepared appellate brief materials (1.92)	7.25 480.00/hr	3,480.00
9/9/2022	SBR Prepared motion for amendment or modification of order appointing receiver; and prepared motion for rehearing and reconsideration (6.67) Conferred with Gina Harbison (.08) Conferred with Mike Silvey (.08) Conferred with Rae Mosier (.08) Call to Blanca Eden (.08) (.08 NO CHARGE)	7.00 480.00/hr	3,360.00
9/10/2022	SBR Prepared statement of uncontroverted facts (GSB) (5.67) Prepared motion for rehearing and reconsideration (receivership) (.50)	6.17 480.00/hr	2,961.60
9/12/2022	SBR Prepared motion for rehearing and reconsideration and prepared email to Blanca Eden (.25) Prepared statement for uncontroverted facts - GSB; Prepared email to Mike McDorman; Prepared GSB - Motion for Summary Judgment papers and exhibits (5.17) Prepared appellate brief / statement of facts (3.58) Call to Mike McDorman and Julian Kuszmaul (.08)	9.08 480.00/hr	4,358.40
9/13/2022	SBR Prepared appellate brief; Researched case law (6.25) Conferred with Chris Harbison (.08) Conferred with Gina Harbison (twice) (.17) Conferred with Julian Kuszmaul (.08) Conferred with Brian Valentine on Quickbooks discovery (.08) (.08 NO CHARGE)	6.58 480.00/hr	3,158.40
9/14/2022	SBR Prepared statement of facts; Prepared appeal brief (3.08) Conferred with Brian Valentine on Quickbooks Data Base Discovery (twice) (.17) (.17 NO CHARGE)	3.08 480.00/hr	1,478.40
9/15/2022	SBR Prepared appellate brief (12.75) Reviewed Nick Zlutchky emails (.17) Conferred with Patrick Bousquet (.33) Conferred with Gina Harbison (.08)	13.33 480.00/hr	6,398.40
9/16/2022	SBR Conferred with Gina Harbison (twice) (.42) Reviewed password emails (.17) Prepared supplemental response to order to show cause in receivership (4.42) Prepared	8.08 480.00/hr	3,878.40

Harblson v. Patriots Bank  
 Invoice # 24574

		<u>Hrs/Rate</u>	<u>Amount</u>
	appellate brief (fact statement) (3.00) Prepared email to Nick Zluticky (.08)		
9/19/2022 SBR	Prepared for upcoming hearing in receivership case; Researched case law (5.92) Conferred with Gina Harblson (.08) Traveled to St. Louis (5.00)	11.00 480.00/hr	5,280.00
9/20/2022 SBR	Prepared for upcoming hearing and traveled to Jefferson County for hearing (3.75) Conferred with Gina Harblson; Met with Chris Harblson and Gina Harblson (.75) Call to Spencer Desai (.08) Conferred with Mike Slivey (.17) and Blanca Eden (.08) Travel to Courthouse and attended hearing (3.33) Met with Blanca Eden, Mike Slivey, Chris Harblson and Gina Harblson (.58) Conferred with Patrick Bousquet (.17) Traveled to airport; Returned to Ft. Lauderdale; Prepared appellate brief materials (4.83) Conferred with Rae Mosler (.08) (.08 NO CHARGE)	13.58 480.00/hr	6,518.40
9/21/2022 SBR	Conferred with Patrick Bousquet on (court) appeal form order allowing sale; Prepared packet for Patrick Bousquet and researched case law (1.00) Conferred with Gina Harblson (.17) Call to Mike McDorman (.08) Conferred with Julian Kuszmaul (.17) Reviewed Patrick Bousquet email (.08)	1.50 480.00/hr	720.00
9/22/2022 SBR	Prepared for and conferred with Mike McDorman (GSB Motion for Summary Judgment) (.83) Conferred with Gina Harblson (.08) Conferred with Mike McDorman and Julian Kuszmaul (GSB) (.75) Conferred with Gina Harblson (.08) Conferred with Patrick Bousquet (.83) Conferred with Rae Mosler (.50) Prepared email to Blanca Eden (.08) (.50 NO CHARGE)	2.67 480.00/hr	1,281.60
9/23/2022 SBR	Conferred with Gina Harblson (twice) and Chris Harblson (.33) Conferred with Mike McDorman and Julian Kuszmaul; Reviewed GSB related emails from Gina Harblson (.42) Reviewed Blanca Eden (.08) Call to Gina Harblson (.08) Prepared production information and filings and two emails to Julian Kuszmaul and Mike McDorman (.42) Conferred with Mike McDorman (.08) Reviewed production email (GSB) (.08) Call to Mike McDorman (.08) Reviewed records index; Reviewed Gina Harblson email (.08)	1.67 480.00/hr	801.60
9/26/2022 SBR	Reviewed Theresa Sapp emails to Nick Zluticky (.17) Conferred with Blanca Eden (.08) Reviewed 2 emails from Gina Harblson and attachments (Patriots Bank records for GSB case) (.50) Reviewed notification of disposition of collateral for Jonesburg (10/12/22) and notice of sale of real property Jonesburg (.17)	0.92 480.00/hr	441.60

Harblson v. Patriots Bank  
 Invoice # 24574

		<u>Hrs/Rate</u>	<u>Amount</u>
9/27/2022	SBR Reviewed tax return (proposed) (Black River Motel) (.33) Call to Patrick Bousquet (.08) Call to Spencer Desai (.08) Conferred with Gina Harblson (twice) (.33) Prepared email to Patrick Bousquet (.08) and Spencer Desai and Rae Moser (.08) Prepared witness list for federal case (1.67) Conferred with Patrick Bousquet (.25)	2.92 480.00/hr	1,401.60
9/29/2022	SBR Call to and email to Patrick Bousquet and Bianca Eden (.17) Conferred with Patrick Bousquet (.08) Reviewed Spencer Desai email on federal case Rule 26 (.17) Reviewed "preview" of writ of prohibition (.76) Conferred with Patrick Bousquet (.25)	1.42 480.00/hr	681.60
9/30/2022	SBR Conferred with Gina Harblson (.08) Reviewed auction sale notices (for appeal) from Patriots Bank (.25) Reviewed hearing transcripts (8/23/22 and 9/20/22) on auction sale stay issues (.50) 2 calls to Chris Harblson (.17) Conferred with Mike Silvey (.17) Conferred with Patrick Bousquet (.25) Conferred with Gina Harblson (.17) Conferred with Brian Valentine (.08) Prepared email to Mike Silvey (.08) (.08 NO CHARGE)	1.67 480.00/hr	801.60

**For professional services rendered**

140.59 \$67,483.20

**Additional Charges :**

	<u>Qty/Price</u>	
9/19/2022 AVIS Car Rental	1 97.83	97.83
Marriott Airport Hotel - St. Louis	1 292.34	292.34
Southwest Airlines	1 868.96	868.96
9/20/2022 Gas	1 22.30	22.30
9/30/2022 Scans	257 0.20	51.40

**Photocopies**

529  
0.20 105.80

**Total costs**

\$1,438.63

**For professional services rendered**

140.59 \$68,921.83



Harblson v. Patriots Bank  
Invoice # 24574

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	<u>Amount</u>
Total amount of this bill	\$68,921.83
Previous balance	\$343,432.12
Balance due	<u>\$412,353.95</u>

Timekeeper Summary			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen Rakusin	140.59	480.00	\$67,483.20

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

November 3, 2022

gina@harbisonlumber.com

Gina Harbison

RE : HARBISON V. PATRIOTS BANK

OUR FILE NO. : 3062.1

Dear Ms. Harbison:

Enclosed please find my bill for services rendered in the above styled case for the period of October 1, 2022 through October 31, 2022.

The total amount due for fees is \$27,163.20. The total amount due for costs this billing period is \$204.40. The total amount due for fees and costs this billing period is \$27,367.60. You had a previous balance in the amount of \$412,353.95. Payments were received in the amount of \$0.00.

The total amount now due is \$439,721.55.

Payment is now due. Your prompt payment of these items will be greatly appreciated.

Sincerely,



Stephen Rakusin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

Credit Card # \_\_\_\_\_ Exp. Date / CVV Code: \_\_\_\_\_

Remit payment to:

SIGNATURE (AS IT APPEARS ON THE CARD)

Litigation Lawyers,  
Professional Association  
2881 East Oakland Park Blvd., Suite 434  
Ft. Lauderdale, FL 33306

PRINT NAME (AS IT APPEARS ON THE CARD)

DAYTIME PHONE \_\_\_\_\_

**LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harblson v. Patriots Bank

November 3, 2022

File # 3062.1

Invoice # 24575

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
10/3/2022 SBR	Conferred with Brian Valentine (.08) Conferred with Gina Harblson (.08) Conference call with Spencer Desai, Gina Harblson and Brian Valentine (.67) Conferred with Gina Harblson (.25) Conferred with Mike McDorman (.08) Prepared email to Spenser Desai (.08) Reviewed email from Gina Harblson (.08) (.08 NO CHARGE)	1.25 480.00/hr	600.00
10/4/2022 SBR	Reviewed text messages from Harblsons (.17) Reviewed Bank records (GSB/MFR) on loan analysis (.17) Conferred with Gina Harblson (.08) Prepared Mike Silvey Affidavit and revisions to GSB Affidavit (Gina Harblson (2.83) Conferred with mike Silvey (.17) Prepared Stephen Rakusin Affidavit (1.08) Prepared email to Mike Silvey (.08) Prepared email to Patrick Bousquet (.08) Conferred with Patrick Bousquet (.08) Reviewed email from Patrick Bousquet (.08) Conferred with Brian Valentine (.17) Reviewed Gina Harblson email (.08) (.17 NO CHARGE)	5.25 480.00/hr	2,520.00
10/5/2022 SBR	Prepared Gina Harblson GSB Investing Affidavit, Statement of Uncontroverted Facts and Memo of Law on Motion for Summary Judgment and Stephen Rakusin Affidavit on Motion for Summary Judgment (2.17) Conferred with Mike McDorman (.08) Conferred with Mike Silvey (.08) Prepared letter to Bank counsel on behalf of Potosi Charcoal, LLC (1.00) Conferred with Chris Harblson (.08) Conferred with Gina Harblson (.25) Conferred with Patrick Bousquet (.33) Prepared Witness List and Damages Disclosure on Rule 26 (Fed) (3.50) Call to Mike McDorman (.08) Conferred with Julian Kuszmaul (.08) Conferred with Gina Harblson and Bianca Eden (.17)	7.75 480.00/hr	3,720.00

Harblson v. Patriots Bank  
 Invoice # 24575

		<u>Hrs/Rate</u>	<u>Amount</u>
10/6/2022	SBR Reviewed 2 Gina Harblson emails (in main case) (.17) Reviewed Mike Silvey email (Mineral Fork Ranch - Writ of Prohibition) (.08) Reviewed Missouri Supreme Court filings (.25) Conferred with Mike McDorman (.25) Conferred with Gina Harblson (twice) (.17) Conferred with Julian Kuszmaul (.08) Prepared damages disclosure (.75) Conferred with Patrick Bousquet (.08) Call to Spencer Desai (.08) Reviewed Blanca Eden email and CRAZ Redemption Notice (.08)	2.00 480.00/hr	960.00
10/7/2022	SBR Conferred with Mike Silvey and Gina Harblson (at auction sale) (.17) Conferred with Gina Harblson (.08) Call to Spencer Desai (.08) Reviewed Order from Missouri Sup. Court denying Writ of Prohibition (.08) Reviewed Zack Hemenway email on Fed. Case pleading amendment (.08)	0.50 480.00/hr	240.00
10/10/2022	SBR Reviewed 6 Blanca Eden emails and attachments (.50) Reviewed 7 Gina Harblson emails and attachments (.58) Reviewed 2 Mike Silvey emails (.17) Reviewed Nick Zluticky email (.08) Reviewed Patriots Bank Initial disclosure in Federal Guaranty Case (.08)	1.42 480.00/hr	681.60
10/11/2022	SBR Met with Chris Harblson and Gina Harblson (Westin Hotel) (1.83) Conferred with Mike Silvey (.08) Conferred with Chris Harblson (.08) Conferred with Spencer Desai (.25) Prepared memo to file (.08) Reviewed Patriots Bank Second Amended Petition in Federal Guaranty Case (.17)	2.50 480.00/hr	1,200.00
10/12/2022	SBR Conferred with Gina Harblson (.08) Reviewed Blanca Eden email (main case) (.08) Reviewed Rule 26 Disclosure Draft in Fed. Guaranty Case (.17)	0.33 480.00/hr	158.40
10/13/2022	SBR Prepared memo to file; Reviewed Pre-Trial Order in main receivership case (.25)	0.25 480.00/hr	120.00
10/14/2022	SBR Reviewed Receiver and Attorney Fee Motions; Prepared responses (.25) Reviewed Spencer Desai email (.08)	0.33 480.00/hr	158.40
10/15/2022	SBR Conferred with Gina Harblson (.08) Conferred with Chris Harblson (.08) Prepared materials for pleading in Fed. Case (.25)	0.42 480.00/hr	201.60
10/17/2022	SBR Reviewed proposed Request for Admissions in Fed. Guaranty Case; Prepared answers to Request for Admissions, Objections to Interrogatories (7.83) Call to Spencer Desai (.08) Conferred with Spencer Desai (.17) Conferred with Chris Harblson (.08) (.08 NO CHARGE)	8.00 480.00/hr	3,840.00

Harbison v. Patriots Bank  
 Invoice # 24575

		<u>Hrs/Rate</u>	<u>Amount</u>
10/18/2022	SBR Prepared response to Request for Production; Prepared Objection to Interrogatories; Prepared responses to Request for Admissions in Fed. Guaranty Case (5.83) Call to Spencer Desai (.08) Conferred with Chris Harbison (.08)	6.00 480.00/hr	2,880.00
10/19/2022	SBR Prepared Request for Admissions, Request to Produce Objections (1.75) Conferred with Chris Harbison (.17) Conferred with Spencer Desai (twice) (.50) Conferred with Gina Harbison (.08) Reviewed Mike Silvey email (.08) Conferred with Rae Mosier (.25) (.25 NO CHARGE)	2.58 480.00/hr	1,238.40
10/20/2022	SBR Prepared objections to request for fees from the receiver and his counsel; Researched case law; Reviewed recent motions for payment of fees (3.75) Conferred with Blanca Eden (.17)	3.92 480.00/hr	1,881.60
10/21/2022	SBR Conferred with Rae Mosier (.08)	0.08 480.00/hr	NO CHARGE
10/25/2022	SBR Prepared email to Blanca Eden (.08) Call to Mike McDorman (.08) Conferred with Julian Kuszmaul on GSB Investing (.08) Reviewed deposition notes for Scott Cooper and Cameron Cooper (.17)	0.42 480.00/hr	201.60
10/26/2022	SBR Conferred with Mike Silvey (.08) Prepared email to Gina Harbison (.17) Reviewed Blanca Eden email (.08) Conferred with Blanca Eden (.50) Reviewed Bank's Motion to Compel (.08) Prepared email to Patrick Bousquet (.08)	1.17 480.00/hr	561.60
10/27/2022	SBR Call to Chris Harbison (.08) Conferred with Chris Harbison (twice) Reviewed Patriots Bank suggestions in GSB Investing to GSB Investing suggestions (.83) Conferred with Rae Mosier (.17) (.17 NO CHARGE)	1.08 480.00/hr	518.40
10/28/2022	SBR Reviewed Mike Silvey email (.08) Conferred with Gina Harbison (.17) Prepared reviewed email on 2006 letter and proposed letter to Eric Peterson (.17) Reviewed Blanca Eden email and motion (.08) Conferred with Blanca Eden (.08) Prepared email to Blanca Eden (.17) Call to Patrick Bousquet (.08) Prepared materials on Brent King testimony (.08) and emails to Blanca Eden (.33) Reviewed court order compelling discovery in Mineral Fork Ranch case (.08)	1.33 480.00/hr	638.40
10/29/2022	SBR Conferred with Chris Harbison (.25)	0.25 480.00/hr	120.00
10/30/2022	SBR Prepared answer, affirmative defenses and counterclaim to Bank's second amended petition (federal case) (1.75) Prepared opposition to motion to	3.67 480.00/hr	1,761.60

Harbison v. Patriots Bank

Invoice # 24575

	<u>Hrs/Rate</u>	<u>Amount</u>
sell potosi charcoal inventory (1.50) and materials regarding order on motion to borrow (.42)		
10/31/2022 SBR Prepared notice of objection, motion to dismiss and motion to stay receiver's slab sale motion (.92) Call to Patrick Bousquet (.08) Call to Gina Harbison (.08) Prepared answer, affirmative defenses, counterclaim and third party complaint in federal case (4.42) Conferred with Bianca Eden (.17) Conferred with Patrick Bousquet and associate counsel (.50) Conferred with Chris Harbison (.08)	6.17 480.00/hr	2,961.60
For professional services rendered	56.67	\$27,163.20
Additional Charges :		
	<u>Qty/Price</u>	
10/31/2022 Photocopies	451 0.20	90.20
Scans	571 0.20	114.20
Total costs		\$204.40
For professional services rendered	56.67	\$27,367.60
Total amount of this bill		\$27,367.60
Previous balance		\$412,353.95
Balance due		\$439,721.55

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen Rakusin	56.59	480.00	\$27,163.20

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

December 4, 2022

[gina@harbisonlumber.com](mailto:gina@harbisonlumber.com)

Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:

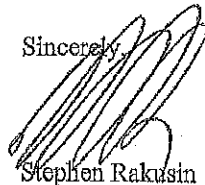
Enclosed please find my bill for services rendered in the above styled case for the period of November 1, 2022 through November 30, 2022.

The total amount due for fees is \$37,156.80. The total amount due for costs this billing period is \$1,764.49. The total amount due for fees and costs this billing period is **\$38,921.29**. You had a previous balance in the amount of \$439,721.55. Payments were received in the amount of \$20,000.00.

**The total amount now due is \$458,642.84.**

Payment is now due. Your prompt payment of these items will be greatly appreciated.

Sincerely,



Stephen Rakusin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

Credit Card # \_\_\_\_\_ Exp. Date / CVV Code: \_\_\_\_\_

Remit payment to:

SIGNATURE (AS IT APPEARS ON THE CARD)

PRINT NAME (AS IT APPEARS ON THE CARD)

DAYTIME PHONE \_\_\_\_\_

Litigation Lawyers,  
Professional Association  
2881 East Oakland Park Blvd., Suite 434  
Ft. Lauderdale, FL 33306

**LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harblson v. Patriots Bank

December 4, 2022

File # 3062.1

Invoice # 24582

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
11/1/2022	SBR Conferred with Chris Harblson (.17) Conferred with Rae Mosier (.17) (.17 NO CHARGE)	0.17 480.00/hr	81.60
11/2/2022	SBR Prepared second request to produce to receiver and certificate of service, new schedule B (list of contact persons) (3.08) Reviewed Julian Kuszmaul email (.08) Call to Mike McDorman (.08) Call to Julian Kuszmaul (.08) Call to Bianca Eden (.08)	3.42 480.00/hr	1,641.60
11/3/2022	SBR Call to Mike McDorman (.08) Conferred with Julian Kuszmaul (.17) Conferred with Rae Mosier (.08) (.08 NO CHARGE)	0.25 480.00/hr	120.00
11/4/2022	SBR Reviewed Gina Harblson emails and attachments (.25) Reviewed Julian Kuszmaul email (.08) Conferred with Mike Silvey (.08) Call to Gina Harblson (.08) Prepared for upcoming deposition (3.00) Conferred with Gina Harblson (several times) (.33) Call to Julian Kuszmaul (.08) Conferred with Chris Harblson (.08)	4.00 480.00/hr	1,920.00
11/5/2022	SBR Prepared for upcoming deposition of Scott Cooper and Cameron Cooper (7.17) Conferred with Gina Harblson (.17)	7.33 480.00/hr	3,518.40
11/6/2022	SBR Traveled to Hillsboro Missouri (7.50) Met with Gina Harblson and Chris Harblson and prepared for upcoming depositions; Met with Bianca Eden (5.17) Conferred with Mike Silvey (.08) Met with Chris and Gina Harblson (1.25) Traveled to Hotel (.50) (1.25 NO CHARGE)	14.50 480.00/hr	6,960.00
11/7/2022	SBR Prepared cost and time declaration (.50) Prepared initial brief to Missouri Supreme Court (2.08) Traveled from Festus, Missouri to Ft. Lauderdale, Fla. (8.42) Conferred with Gina Harblson; Conferred with Rae Mosier;	11.00 480.00/hr	5,280.00

(954) 356-0496



Harblson v. Patriots Bank  
 Invoice # 24582

		<u>Hrs/Rate</u>	<u>Amount</u>
	Conferred with Julian Kuzmaul; Reviewed Zack Hemenway email (GSB case) (.08)		
11/8/2022 SBR	Prepared cost and time declaration (.83) Conferred with Mike Silvey (.17) Prepared appellant's initial brief (motion to vacate) (7.50) Prepared email to Mike Silvey (.08)	8.58 480.00/hr	4,118.40
11/9/2022 SBR	Prepared initial brief (5.25) Conferred with Mike Silvey (.08) Call to Patrick Bousquet (.08) Call to Julian Kuzmaul (.08) Reviewed Andrew Scaratto (Stinson Lawyer) email in fed guaranty case (.08)	5.58 480.00/hr	2,678.40
11/10/2022 SBR	Reviewed Stinson email (.08) Prepared materials for Cooper depositions (.87) Call to Spencer Desai (.08) Reviewed Spencer Desai email; Conferred with Patrick Bousquet (.08) Conferred with Gina Harblson (.08)	1.00 480.00/hr	480.00
11/11/2022 SBR	Prepared initial brief (.25) Conferred with Gina Harblson (.17) Reviewed Nick Zluticky / Mike Pappas letter on discovery in federal guaranty case (.25)	0.67 480.00/hr	321.60
11/14/2022 SBR	Prepared initial brief to Missouri Supreme Court (4.25) Reviewed draft motion to compel depositions and motion for sanctions and call to Mike Silvey (receivership case) (.17) Conferred with Patrick Bousquet (.08) Reviewed Andrew Scavotto (Stinson) email (fed case) (.08)	4.58 480.00/hr	2,198.40
11/15/2022 SBR	Conferred with Blanca Eden (.08) Conferred with Gina Harblson (.08)	0.17 480.00/hr	81.60
11/17/2022 SBR	Conferred with Blanca Eden (.08) Conferred with Spencer Desai (.08) Conferred with Gina Harblson (.08) Reviewed Blanca Eden / Mike Silvey emails (.08)	0.33 480.00/hr	158.40
11/18/2022 SBR	Conferred with Patrick Bousquet and Katie (.58) Reviewed Blanca Eden email (.08) Reviewed Zack Hemenway email (.08)	0.75 480.00/hr	360.00
11/20/2022 SBR	Reviewed Mike Silvey email (.08) Call to Mike Silvey (.08) Reviewed hearing notice on Bank's motion to compel and sanctions (.08)	0.25 480.00/hr	120.00
11/21/2022 SBR	Call to Spencer Desai and prepared email to Spencer Desai (.08) Reviewed email from Blanca Eden (.08) Call to Mike Silvey (.08) Researched discovery case law (fed case) (2.67) Conferred with Blanca Eden (.08) Conferred with Mike Silvey (.08) Conferred with Gina Harblson (.17) Conferred with Rae Mosler (.08) (.08 NO CHARGE)	3.33 480.00/hr	1,598.40
11/22/2022 SBR	Prepared for upcoming meet and confer in federal case (.25) Prepared Motion for Protective Order in fed case for deposition of Chris Harblson (2.00) Met and conferred with Spencer Desai, Zack Hemenway and Mike Pappas	3.67 480.00/hr	1,761.60

Harbison v. Patriots Bank  
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		<u>Hrs/Rate</u>	<u>Amount</u>
	(1.00) Conferred with Spencer Desal (.25) (fed case) Reviewed email from Zack Hemenway (.17) (fed case)		
11/23/2022 SBR	Prepared Chris Harbison Motion for Protective Order in federal case (2.25) Reviewed reply of Bank to affirmative defenses in federal case (.25) Call to Spencer Desal (.08) Call to Bianca Eden (.08)	2.67 480.00/hr	1,281.60
11/28/2022 SBR	Conferred with Bianca Eden (.33) Call to Gina Harbison (.08) Conferred with Gina Harbison (.17) Reviewed Bianca Eden email (.08) Conferred with Bianca Eden, Chris Harbison and Gina Harbison (.67)	1.33 480.00/hr	638.40
11/29/2022 SBR	Reviewed 3 court orders (Receivership Case) (1.25) Reviewed Cameron Cooper affidavit (.08) Reviewed Patrick Bousquet email (.08) Conferred with Mike Silvey (.33) Call to Patrick Bousquet (.08) Conferred with Gina Harbison (.17) Conferred with Patrick Bousquet's paralegal (.25) Reviewed Bank's response in fed guaranty case to Chris Harbison motion for protective order (.17) Reviewed amended notice of videotape deposition for Chris Harbison in fed. guaranty case (.08)	1.50 480.00/hr	720.00
11/30/2022 SBR	Reviewed Zack Hemenway email (.08) Call to Chris Harbison (.08) Reviewed Bianca Eden email (.08) Conferred with Mike Silvey (.08) Researched stay / abatement case law for receivership case motion to sell slabs (1.42) Conferred with Gina Harbison (.33) Call to Spencer Desal (.08) Reviewed subpoena duces tecum for Legend Land Services (Teresa Russell) (.17)	2.33 480.00/hr	1,118.40

**For professional services rendered**

**77.41 \$37,156.80**

**Additional Charges :**

	<u>Qty/Price</u>	
11/6/2022 AVIS	1 164.25	164.25
Hotel - Holiday Inn	1 174.70	174.70
Southwest Airlines	1 1,191.45	1,191.45
11/7/2022 Meals - St. Louis Airport	1 23.89	23.89
11/30/2022 Scans	72 0.20	14.40

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	<u>Qty/Price</u>	<u>Amount</u>
11/30/2022 Photocopies	979 0.20	195.80
Total costs		<u>\$1,764.49</u>
For professional services rendered	77.41	<u>\$38,921.29</u>
Total amount of this bill		<u>\$38,921.29</u>
Previous balance		\$439,721.55
11/8/2022 Payment - Thank You		(\$10,000.00)
11/21/2022 Payment - Thank You		(\$10,000.00)
Total payments and adjustments		<u>(\$20,000.00)</u>
Balance due		<u>\$458,642.84</u>

Timekeeper Summary			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen Rakusin	77.41	480.00	\$37,156.80

**LITIGATION LAWYERS,  
PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, Florida 33306

Telephone: (954) 356-0496

January 6, 2023

gina@harbisonlumber.com  
Gina Harbison

**RE : HARBISON V. PATRIOTS BANK**

**OUR FILE NO. : 3062.1**

Dear Ms. Harbison:

Enclosed please find my bill for services rendered in the above styled case for the period of December 1, 2022 through December 31, 2022.

The total amount due for fees is \$38,078.40. The total amount due for costs this billing period is \$1,932.40. The total amount due for fees and costs this billing period is **\$40,010.80**. You had a previous balance in the amount of \$458,642.84. Payments were received in the amount of \$20,000.00.

**The total amount now due is \$498,653.64.**

Payment is now due. Your prompt payment of these items will be greatly appreciated.

Sincerely,



Stephen Rakusin

Cc: Rae Mosier, Esq.

Enclosure

----- Please Cut off Stub and Return with Payment -----

Payment by check # \_\_\_\_\_ Amount: \$ \_\_\_\_\_ File #: 3062.1

Charge my Credit Card to: ☐ Visa ☐ Master Card ☐ Discover ☐ Amex

Credit Card # \_\_\_\_\_ Exp. Date / CVV Code: \_\_\_\_\_

Remit payment to:

SIGNATURE (AS IT APPEARS ON THE CARD)

Litigation Lawyers,  
Professional Association  
2881 East Oakland Park Blvd., Suite 434  
Ft. Lauderdale, FL 33306

PRINT NAME (AS IT APPEARS ON THE CARD)

DAYTIME PHONE \_\_\_\_\_

**LITIGATION LAWYERS, PROFESSIONAL ASSOCIATION**

2881 East Oakland Park Blvd., Suite 434  
Fort Lauderdale, FL 33306

Invoice submitted to:  
Harbison v. Patriots Bank

January 6, 2023

File # 3062.1

Invoice # 24585

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
12/1/2022	SBR Call to Spencer Desai (.08) Reviewed Gregg Groves email (.08) (Cooper Deposition dates) (.08) Conferred with Mike Silvey (.17) Conferred with Spencer Desai (.25) Prepared discovery packet and email to Spencer Desai (.17) Researched abatement/stay/jurisdictional case law (4.42) Conferred with Rae Mosler (.58) Conferred with Chris Harbison (.08) Conferred with Bianca Eden (.08) Conferred with Gina Harbison (.50) Reviewed draft initial appellate brief (.92) Conferred with Patrick Bousquet (.75) (.58 NO CHARGE)	6.58 480.00/hr	3,168.40
12/2/2022	SBR Conferred with Rae Mosler (.08) Researched abatement case law (.42) (.08 NO CHARGE)	0.42 480.00/hr	201.60
12/3/2022	SBR Prepared memo of law on motion to sell slabs (6.08)	6.08 480.00/hr	2,918.40
12/4/2022	SBR Prepared memorandum of law on slab sale motion (1.00) Prepared Gina Harbison affidavit/declaration (2.00)	3.00 480.00/hr	1,440.00
12/5/2022	SBR Prepared Gina Harbison affidavit/declaration; Prepared exhibits for affidavit; Prepared memorandum of law on dismissal/abatement and stay (3.58) Call to Gina Harbison (.08) Conferred with Gina Harbison (.42) Prepared memo of law opposing discovery and sanctions (2.83) Conferred with Bianca Eden (.08) Conferred with Mike Silvey (.08)	7.08 480.00/hr	3,398.40
12/6/2022	SBR Prepared memo of law on Bank's motion for sanctions and motion to compel (4.50) Conferred with Gina Harbison (.17) Conferred with Mike Silvey (.08) Call to Spencer Desai (.08) Reviewed Gregg Groves email on Cooper depositions (.08)	11.50 480.00/hr	5,520.00

(954) 356-0496

Harblson v. Patriots Bank  
 Invoice # 24585

		<u>Hrs/Rate</u>	<u>Amount</u>
12/7/2022	SBR Prepared memo of law on Bank's discovery motion (7.00) Prepared email to Mike Silvey (.08) Conferred with Rae Mosier (.08) Conferred with Gina Harblson (.25) Reviewed Bank's discovery to Mineral Fork Ranch (Request to Produce / Interrogatories and Request for Admissions) (.25) Prepared email to Bianca Eden (.08) (.08 NO CHARGE)	7.67 480.00/hr	3,681.60
12/8/2022	SBR Prepared for upcoming hearing (3.00) Conferred with Gina Harblson (.17) Traveled to St. Louis (6.17)	9.33 480.00/hr	4,478.40
12/9/2022	SBR Prepared for upcoming hearing; Traveled to Hillsboro, MO; Met with Gina Harblson 5.42) Attended hearing (3.83) Conferred with Bianca Eden (.17) Conferred with Mike Silvey (.17) Returned to St. Louis (1.00) Conferred with Rae Mosier and Gina Harblson and Chris Harblson (.58) Conferred with Rae Mosier (.33) (.33 NO CHARGE)	11.08 480.00/hr	5,318.40
12/10/2022	SBR Prepared memo to file (.50) Call to Patrick Bousquet (.08) Traveled to Ft. Lauderdale (4.50) Conferred with Rae Mosier (.08) (.08 NO CHARGE)	5.00 480.00/hr	2,400.00
12/11/2022	SBR Conferred with Patrick Bousquet (.50) Conferred with Rae Mosier (.17) (.17 NO CHARGE)	0.50 480.00/hr	240.00
12/12/2022	SBR Reviewed notice of hearing from Receiver on slab sale motion to Potosi Charcoal (.08); Conferred with Mike Silvey (.50) Researched case law on discovery and prepared second motion for protective order (.58) Conferred with Patrick Bousquet (1.33) Prepared email to Julian Kuszmaul and Mike McDorman (.17) Reviewed GSB case filings (.25) Prepared removal trial materials (.58) Conference call with Julian Kuszmaul and Mike McDorman (.50) Conferred with Spencer Desai (.08) Call to Gina Harblson (.08) (.50 NO CHARGE)	4.08 480.00/hr	1,958.40
12/13/2022	SBR Prepared response for Potosi Charcoal, LLC to Receiver's slab motion (.17) Prepared email to Julian Kuszmaul and Mike McDorman (.08) Call to Gina Harblson (.08) Conferred with Mike McDorman and Julian Kuszmaul (.25) Conferred with Chris Harblson, Gina Harblson and Rae Mosier (1.00) Prepared Motion for Summary Judgment email to Mike McDorman and Julian Kuszmaul (.08) Reviewed 2 Gina Harblson emails (.17) Conferred with Rae Mosier (.25) Reviewed Bianca Eden email (.08) Conferred with Gina Harblson and Bianca Eden (.25) Conferred with Rae Mosier (.17) Conferred with Gina Harblson (.08) Reviewed 2 Gina Harblson emails (.08) Reviewed	2.58 480.00/hr	1,238.40

Harbison v. Patriots Bank  
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		<u>Hrs/Rate</u>	<u>Amount</u>
	letter from Zach Fairlie (response to discovery) (.17) Reviewed info on special master (.08) (.75 NO CHARGE)		
12/14/2022 SBR	Conferred with Rae Mosier (.08) Call to Blanca Eden (.08) Call to Mike Silvey (.08) Conferred with Mike Silvey (.08) (.08 NO CHARGE)	0.17 480.00/hr	81.60
12/15/2022 SBR	Conferred with Mike Silvey (.08) Call to Blanca Eden (.08) Conferred with Blanca Eden (.25) Prepared motion for rehearing materials (3.08) Conferred with Rae Mosier (.08) Reviewed email from Eric Peterson (.08) (.08 NO CHARGE)	3.42 480.00/hr	1,641.60
12/16/2022 SBR	Call to Blanca Eden (.08) Conferred with Blanca Eden (.17) Conferred with Mike Silvey (.08) Reviewed court order (.08) (master and hearing cancellation receivership case)	0.42 480.00/hr	201.60
12/17/2022 SBR	Conferred with Rae Mosier (.25) Call to Julian Kusmaul (.08) Reviewed Blanca Eden email to Nick Zluticky (.08) (.25 NO CHARGE)	0.17 480.00/hr	81.60
12/19/2022 SBR	Conferred with Chris Harbison (.08) Conferred with Rae Mosier (.08) Reviewed Blanca Eden email and hearing transcript (12/9/22 hearing) (.17) Reviewed Nick Zluticky email in fed guaranty case (.08) (.17 NO CHARGE)	0.25 480.00/hr	120.00
12/29/2022 SBR	Conferred with Rae Mosier (.08)	0.08 480.00/hr	NO CHARGE
For professional services rendered		79.41	\$38,078.40

Additional Charges :

	<u>Qty/Price</u>	
12/6/2022 Gas	1 19.35	19.35
12/8/2022 AVIS	1 215.59	215.59
Hotel - St. Louis Marriott	1 505.46	505.46

Harbison v. Patriots Bank  
 Invoice # 24585

	<u>Qty/Price</u>	<u>Amount</u>
12/8/2022 SouthWest	1 874.96	874.96
12/9/2022 Gas - St. Louis Airport	1 12.45	12.45
Meals - Gary's	1 50.79	50.79
12/31/2022 Scans	248 0.20	49.60
Photocopies	1,021 0.20	204.20
<b>Total costs</b>		<b>\$1,932.40</b>
<b>For professional services rendered</b>	<b>79.41</b>	<b>\$40,010.80</b>
<b>Total amount of this bill</b>		<b>\$40,010.80</b>
<b>Previous balance</b>		<b>\$458,642.84</b>
<b>Balance due</b>		<b>\$498,653.64</b>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen Rakusin	79.33	480.00	\$38,078.40



**IN THE CIRCUIT COURT OF THE 17th JUDICIAL CIRCUIT IN AND FOR  
BROWARD COUNTY, FLORIDA**

LITIGATION LAWYERS, )  
PROFESSIONAL ASSOCIATION, a )  
Florida professional corporation, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
CHRISTOPHER HARBISON, individually, )  
And REGINA HARBISON, individually, )  
 )  
Defendants. )

Case No. CACE-23-0190056

**NOTICE TO STATE COURT OF  
FILING OF NOTICE OF REMOVAL**

Notice is hereby given that on February 23rd, 2024 Defendants Christopher Harbison and Regina Harbison (“Harbisons”) timely filed a Notice of Removal of the above-captioned action in the United States District Court for the Southern District of Florida, pursuant to 28 U.S.C. § 1332, and 28 U.S.C § 1446(a). A copy of the Notice of Removal is attached as Exhibit A. Please transfer the court file in this case to the Clerk of the United States District Court for the Southern District of Florida.

Respectfully submitted,

/s/ Kevin P. McCoy  
Kevin P. McCoy  
Florida Bar No. 36225  
Carlton Fields, P.A.  
4221 W. Boy Scout Blvd., Ste. 1000  
Tampa, FL 33607  
Tel: (813) 223-7000  
Fax: (813) 229-4133  
kmccoy@carltonfields.com

and

CAPES, SOKOL, GOODMAN & SARACHAN, P.C.

/s/ R. Thomas Avery

R. Thomas Avery, (pro hac vice to be filed)  
Aaron E. Schwartz, (pro hac vice to be filed)  
8182 Maryland Avenue, Fifteenth Floor  
St. Louis, Missouri 63105  
Telephone: (314) 721-7701  
Facsimile: (314) 721-0554  
avery@capessokol.com  
schwartz@capessokol.com

***Attorneys for Defendants Christerphor Harbison and  
Regina Harbison***

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on all counsel of record on this 23rd day of February 2024 via the Court's electronic filing system.

/s/ Kevin P. McCoy